department of economic opportunity
COUNTY OF LOS ANGELES



Los Angeles County General Hospital Campus Master Plan

Draft Subsequent EIR | County of Los Angeles

State Clearinghouse No. 2014051061

May 2026



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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This document is a Draft Subsequent Environmental Impact Report (SEIR) to the Los Angeles County + University of Southern California (LAC+USC) Medical Center Campus Master Plan EIR (2014 Master Plan EIR, State Clearinghouse No. 2014051061) that was certified on November 18, 2014, by the Los Angeles County Board of Supervisors (Board) as the governing body of the County of Los Angeles (County). This Draft SEIR addresses the environmental effects associated with the implementation of the proposed Los Angeles County General Hospital Campus Master Plan (Proposed Project). As the owner of the Project Site and the public agency involved in development of the Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. The California Environmental Quality Act (CEQA) requires that public agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority.

ES.2 ENVIRONMENTAL PROCEDURES

This Draft SEIR has been prepared pursuant to CEQA and the State CEQA Guidelines to assess the environmental effects associated with implementation of the Proposed Project as well as anticipated future discretionary actions and approvals. CEQA establishes six main objectives for an EIR:

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

An EIR is the most comprehensive form of environmental documentation identified in CEQA ; it is intended to provide an objective, factually supported analysis, and full disclosure of the

environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was prepared in accordance with CEQA and the State CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ES.2.1 Type and Purpose of this Draft SEIR

As described in the State CEQA Guidelines, different types of EIRs are used for varying situations and intended uses. The Board certified the 2014 Master Plan EIR and approved the 2014 Master Plan on November 18, 2014. The 2014 Master Plan EIR evaluated the environmental effects associated with implementation of the 2014 Master Plan and identified mitigation measures to avoid or substantially lessen significant impacts where feasible, specific to the project envisioned at that time. The 2014 Master Plan EIR evaluated demolition of some existing structures and buildings on the Project Site, and development of new uses. Under the 2014 Master Plan, including the subsequent addenda, full buildout could result in a total of approximately 1,227,412 square feet of development throughout the Project Site.

The Proposed Project under consideration represents a new Master Plan that would guide redevelopment on parts of the Project Site. The Proposed Project represents a substantial change from the project considered in the 2014 Master Plan EIR and related County approvals. Therefore, pursuant to State CEQA Guidelines Section 15162, Subsequent EIRs and Negative Declarations, the County has determined that a Subsequent EIR is the appropriate level of CEQA review.

This Draft SEIR evaluates the potential environmental effects resulting from implementation of the Proposed Project, and to the extent feasible, identifies feasible mitigation measures necessary to avoid or substantially lessen significant environmental impacts associated with the Proposed Project. This Draft SEIR relies on and incorporates by reference the analysis, findings, and conclusions of the 2014 Master Plan EIR, subsequent addenda, and exemption (collectively referred to as "2014 Master Plan EIR") to the extent that the prior analysis remains relevant and applicable. The 2014 Master Plan EIR continues to provide the foundation for the environmental review of the Proposed Project and the analysis contained in this Draft SEIR builds upon that prior work rather than repeating it in its entirety.

This Draft SEIR has been prepared in accordance with State CEQA Guidelines Section 15162, Subsequent EIRs and Negative Declarations. State CEQA Guidelines Section 15162(a) and 15162(b) state that:

- **Section 15162(a):** When an EIR has been certified or a negative declaration adopted for a project, no SEIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - 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;
  - 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
  - New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- **Section 15162(b):** If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

This Draft SEIR also fulfills the requirements for a Program EIR. Program EIRs are typically more conceptual than Project EIRs, with a broader, or "programmatic," discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the State CEQA

Guidelines, a Program EIR may be prepared for a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, at an early time when the agency has greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare Program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether additional CEQA documentation are necessary. However, if the agency finds, after analysis under State CEQA Guidelines Section 15162, that no subsequent EIR would be required for a subsequent activity under the Program, a subsequent activity may be determined to be within the Program EIR's scope, and the public agency may determine that additional environmental documents are not required (State CEQA Guidelines sec. 15168[c]). When a lead agency relies on a program EIR for a subsequent activity, it must incorporate appliable mitigation measures and alternatives from the program EIR into the subsequent activities (State CEQA Guidelines sec. 15168[c][3]). If a subsequent activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis. The State CEQA Guidelines encourage the use of Program EIRs, citing five advantages:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
- Focus on cumulative impacts that might be slighted in a case-by-case analysis;
- Avoid continual reconsideration of recurring policy issues;
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them;
- Reduce paperwork by encouraging the reuse of data (through tiering) (State CEQA Guidelines sec. 15168[h]).

As a program-level SEIR, this Draft SEIR evaluates a reasonable and likely maximum development that could be developed based on the level of information that is currently available. Later activities would also be required to adhere to applicable regulations, and standards and mitigation measures identified as part of this Draft SEIR. Review of proposed future projects under the proposed Master Plan would comply with State CEQA Guidelines Section 15168 and other applicable provisions of CEQA.

ES.2.2 Draft SEIR Organization

Executive Summary. Summarizes the background and description of the Proposed Project, the format of this Draft SEIR, alternatives to the Proposed Project, any areas of controversy or issues to be resolved, and identification of each potential significant environmental effect with proposed mitigation measures.

Chapter 1: Introduction. Describes the purpose of this Draft SEIR, background on the Proposed Project, the environmental review process, and the use of incorporation by reference.

Chapter 2: Project Description. Provides a detailed description of the Proposed Project, including its objectives, its area and location, approvals anticipated to be required as part of the Proposed Project, necessary environmental clearances, and the intended uses of this Draft SEIR.

Chapter 3: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the standards for analysis (i.e., significance criteria used to determine if a significant impact would occur); the methodology to identify and evaluate the potential impacts of the Proposed Project; a summary of impact conclusion from the 2014 Master Plan EIR; the potential adverse environmental effects of the Proposed Project; the level of impact significance with and without mitigation; the potential cumulative impacts of the Proposed Project and other existing, approved, and Proposed Projects in the area; and a comparison of the conclusions presented in this Draft SEIR for the Proposed Project as compared to the County's prior findings from the 2014 Master Plan EIR.

Chapter 4: Alternatives to the Proposed Project. Describes feasible alternatives to the Proposed Project and provides a comparative impact analysis. Alternatives considered but rejected and the environmentally superior alternative are identified.

Chapter 5: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, growth-inducing effects, and mandatory findings of significance.

Chapter 6: Report Preparers and Organizations Consulted. Includes a list of people and organizations that prepared or were contacted during the preparation of this Draft SEIR.

Appendices. The appendices for this document are listed in the table of contents of this Draft SEIR.

ES.3 PROJECT LOCATION

The Project Site (also referred to as Campus in this Draft SEIR) encompasses approximately 81.9 acres that make up the Los Angeles General Medical Center Campus (Campus) located at and

around 1200 State Street, on parcels of land owned by the County of Los Angeles, in the City of Los Angeles. The Project Site consists of a main campus and four additional areas separated from the main campus by local roadways, which are referred to as the "non-contiguous areas" in this Draft SEIR. The 70.5-acre main campus is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the main campus. While this Project Site is defined in order to identify potential environmental impacts for all areas in which future activities associated with the Proposed Project could occur, it is not intended to indicate that all parts of the Project Site would be redeveloped (i.e., the existing Medical Center, the newly constructed RCV facilities). The Campus is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles, in the County of Los Angeles. The Project Site evaluated in this Draft SEIR is the same project site as in the 2014 Master Plan EIR.

A number of buildings and features associated with the medical uses of the Campus are located within the Project Site. The Campus is surrounded by a mix of institutional, medical, commercial, residential, and industrial uses. The Keck School of Medicine of USC campus and other institutional and medical uses are located on the opposite side of Zonal Avenue. Residences are located on the opposite side of Cummings Street and Chicago Street. Commercial uses are located on the opposite side of Marengo Street and residential uses are located further south on the opposite side of Marengo Street. Industrial uses are located south of Alhambra Avenue.

The Project Site is located immediately northeast of Interstate (I) 5 (Golden State Freeway) and north of I-10 (San Bernardino Freeway). The Project Site's location within the City of Los Angeles enables accessibility from multiple communities via I-5 and I-10 as well as regional transit connections, further reinforcing its role as a regional hub for medical services. The Project Site is recognized as a regionally significant facility, central to the provision of health and community services across the County of Los Angeles.

ES.4 SUMMARY OF THE PROPOSED PROJECT

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

configurations, and architectural designs would be prepared as future project-level approvals are proposed and would be consistent with the guiding vision of the proposed Master Plan.

The approximately 51.1 acres of the Project Site that are not subject to the proposed Master Plan would continue to be governed by the previously approved 2014 Master Plan and its associated development parameters. Certain previously approved land uses that were identified in the 2014 Master Plan that have not yet been implemented to date have been carried forth into this Draft SEIR. These uses include Community Facilities, Clean Tech/Light Industrial, Medical Office, General Office, and Hospital[1]. Because development within the areas of the Project Site outside of the Master Plan Boundary would continue to occur pursuant to the 2014 Master Plan, this Draft SEIR evaluates potential environmental impacts associated with a conservative, maximum development scenario across the entire Project Site to ensure that a full range of potential redevelopment on the Project Site is considered.

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

Table ES-1 Proposed Project Land Uses

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

[1] The 2014 Master Plan EIR used different land use nomenclature for the proposed uses under the 2014 Master Plan. The land use titles under the 2014 Master Plan included: Wellness-Oriented Community Facilities, New Utility Plant and Facilities, Outpatient Clinics/Laboratories/Medical Office, Professional/Administrative Office, Research and Development, Hospital Addition, Warehouse/Storage, and Residential Care Facilities. Land uses that would be carried over under the Proposed Project include: Wellness-Oriented Community Facilities (Community Facilities), New Utility Plant and Facilities (Clean Tech/Light Industrial), Outpatient Clinics/Laboratories/Medical Offices (Medical Office), Professional/Administrative Offices (General Office), Hospital, and Research and Development (Clean Tech/Light Industrial).

Table ES-1 Proposed Project Land Uses

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

Additionally, the Proposed Project involves the seismic retrofit, selective demolition, and major improvements to facilitate adaptive reuse of the existing 1.2 million square foot General Hospital Building (known as the Los Angeles County General Hospital–Acute Unit Building, or General Hospital Building in this Draft SEIR) and area surrounding the building, known as the Los Angeles General Hospital–Acute Unit Historic District, which are historical resources pursuant to CEQA. All activities within the General Hospital Building and larger General Hospital–Acute Unit Historic District would be achieved in strict accordance with the Secretary of the Interior's Standards (Standards) for the Treatment of Historic Properties and proposed Project Design Features (PDFs).

The proposed Master Plan would organize the main campus around three hubs connected by pedestrian-oriented corridors. The three hubs include the Commerce Hub, the Historic Hub, and the Medical Hub; each hub would have a distinct mix of uses that would reflect its role on the main campus, while the corridors would ensure connectivity across the main campus.

Height for new buildings would be regulated based on both the building's height relative to the General Hospital Building (19 stories) and key views to the General Hospital Building from on-site locations and surrounding roadways. No structure or physical building projections would exceed the highest elevation point of the roof structure of the existing General Hospital Building (approximately 240 feet from ground level). To maintain sightlines, wayfinding, and a circulation corridor that recognizes the visual prominence of the General Hospital Building and its importance as the heart of a new urban village, a central spine of open space that would be a minimum of 20 feet in width would run east to west within the Project Site from the center of the General Hospital Building's main entrance through the axis framed by the Forecourt buildings, between the footprints of new development, and continuing to the center of the Project Site.

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

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

ES.5 SUMMARY OF PROJECT ALTERNATIVES

State CEQA Guidelines Section 15126.6(a) requires that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Project objectives focus on expanding healthcare services, advancing whole-person health, preserving and adaptively reusing the historic General Hospital, increasing housing and economic opportunities, enhancing community-serving uses, improving circulation and open space, modernizing infrastructure, and promoting long-term sustainability and resilience. The alternatives in this Draft SEIR were based, in part, on their potential to reduce or eliminate the impacts determined to be potentially significant for implementation of the Proposed Project (see Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*). Project alternatives are assessed in further detail in Chapter 4, *Alternatives to the Proposed Project*. As demonstrated in that analysis, while the alternatives provide varying degrees of environmental benefit, each of the alternatives do not meet all of the project objectives.

ES.5.1 Alternative A: No Project/2014 Master Plan Development

According to Section 15156.6(e) of the State CEQA Guidelines, a "no project" alternative shall be evaluated to allow decisionmakers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. Additionally, the no project alternative may represent the continuation of an existing land use or ongoing operation into the future. Thus, the no project alternative represents a continuation of the previously approved 2014 Master Plan, which was analyzed in the 2014 Master Plan EIR. Under the No Project/2014 Master Plan Development (Alternative A), the Proposed Project would not be implemented and the approved 2014 Master Plan would allow for continued operation and incremental modernization of the Medical Center Campus, allowing for renovation, replacement, and

expansion of existing buildings as needed to support ongoing medical, administrative, and supportive functions. No new comprehensive redevelopment or reconfiguration of the Campus would occur beyond what is currently approved. This alternative would allow for approximately 827,801 square feet of demolition and approximately 1,157,070 square feet of new construction —including a proposed 450-bed hospital (400,000 square feet) on the Project Site—consistent with the approved 2014 Master Plan framework. No adaptive reuse of the General Hospital Building would occur.

The Project Site would, therefore, remain developed consistent with prior County approvals, and future improvements would continue to occur in response to operational needs and regulatory requirements, as determined by the County. Overall, Alternative A would result in an approximately 83 percent[2] reduction in development buildout when compared to the Proposed Project. Alternative A would result in less demolition and less new development.

Alternative A would generally reduce short-term construction-related environmental impacts such as aesthetics, air quality, noise, energy use, greenhouse gas emissions, transportation, recreation, public services, and utilities compared to the Proposed Project. However, it would not eliminate impacts entirely, as many operational impacts would remain similar to existing conditions or only slightly reduced. Alternative A would avoid the scale of redevelopment benefits but would not address key existing deficiencies, including insufficient housing, limited open space, outdated infrastructure, and reduced sustainability and resilience features. It would also increase or maintain impacts on cultural resources and could contribute to cumulative impacts over time due to continued reliance on aging systems and outdated site design. Overall, Alternative A is less environmentally advantageous over the long term and would partially meet the Proposed General Hospital objectives, but would not achieve the same level of flexibility, housing delivery, sustainability, or long-term resilience as the Proposed Project.

ES.5.2 Alternative B: General Hospital Adaptive Reuse

The General Hospital Adaptive Reuse Alternative (Alternative B) would result in the seismic retrofit and adaptive reuse of the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District only. This includes the visitor and patient buildings in the Forecourt. As with the Proposed Project, under this alternative, selective demolition would occur within the General Hospital Building and approximately 1.2 million square feet of new uses would be developed in the General Hospital Building. Additionally, as part of the adaptive reuse of the General Hospital Building, this alternative would include the demolition of non-historic buildings and features around the General Hospital Building and area immediately north of the General Hospital Building (mini

[2] ([6,833,578 – 1,157,070]/6,833,578) x 100 = ~83%

warehouse building, barracks D and G, and trailers). No additional development would occur on the remaining portions of the Project Site. The remaining portions of the Project Site would otherwise generally remain in its existing condition, except for required safety/maintenance upgrades and infrastructure upgrades necessary to support continued use of the Campus operations, which could include some off-site improvements. Demolition of additional buildings outside of the General Hospital Building and Los Angeles General Hospital–Acute Building historic district would not occur under this alternative. Under this alternative, utility infrastructure would connect to the existing infrastructure network.

This alternative would implement the proposed programming for the General Hospital Building including up to 90,000 square feet of office space, leasable commercial areas, and event/dining space, as well as up to 615 residential units, within the General Hospital Building. The remaining portions of the Project Site would not be redeveloped and would remain in its existing condition, apart from required safety and maintenance upgrades to support the continued use of the Campus. As with the Proposed Project, all activities within the General Hospital Building and larger General Hospital–Acute Unit Historic District would be achieved in strict accordance with the Secretary of Interior Standards. This alternative would require different seismic requirements as compared to the Proposed Project due to the modified programming.

Alternative B would substantially reduce construction-related impacts compared to the Proposed Project, including impacts related to noise, air quality, greenhouse gas emissions, transportation, and vibration, due to the significantly smaller development footprint. It would also avoid potentially significant and unavoidable impacts on historic resources while implementing design features to ensure compliance with historic preservation standards. However, because redevelopment would be localized, the remainder of the Project Site would remain largely unchanged, resulting in continued reliance on aging utilities, infrastructure, and circulation systems. Due to the limited geographic scope of improvements, Alternative B would not meet the majority of the Proposed Project's objectives and would not achieve the County's long-term vision for a modern, integrated health supportive campus. Overall, Alternative B would partially meet certain objectives, particularly those related to historic preservation and limited economic activation, but would not adequately meet healthcare, housing, infrastructure, and long-term planning objectives compared to the Proposed Project.

ES.5.3 Alternative C: Reduced Density Medical Campus Alternative

The Reduced Density Medical Campus Alternative (Alternative C), would allow for the demolition of previously approved buildings and structures approved for demolition under the 2014 Master Plan, buildings and structures proposed for demolition under the Proposed Project, and redevelopment of the Project Site, over a 25-year horizon, with uses related to the medical and community-serving uses included by the Proposed Project.

Alternative C would implement the Proposed Project with a focus on medical-related uses and would not include the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building. No residential, general office, retail, patient and care giver lodging, education, or clean tech/advanced industrial uses would be developed within the General Hospital Building. Alternative C would be limited to uses including 735,300 square feet of medical office, 400,000 square feet of hospital (450 beds), 160,000 square feet of County-support warehouse uses, and parking would be provided, which are the same square footages proposed for these uses under the Proposed Project (see Chapter 2, *Project Description*). Overall, approximately 1,295,300 square feet of new uses would be introduced on the Project Site. All development that would occur on the Project Site would be new construction, and no adaptive reuse of the General Hospital Building would occur. Demolition as previously evaluated in the 2014 Master Plan EIR would be implemented, as well as demolition of additional buildings as identified in this Draft SEIR (Viaduct, Pharmacy Building, trailers, and crypts). Similar to the Proposed Project, Campus-wide infrastructure and utility improvements necessary to implement the new uses would also occur. Like the Proposed Project, in addition to on-site improvements to infrastructure, some work may occur off-site within the City of Los Angeles, such as utility connections/replacements, public right-of-way improvements, and other related activities. Compared to the Proposed Project, Alternative C would result in a reduced overall development intensity, fewer new buildings, and a more limited mix of land uses.

Alternative C would reduce construction-related environmental impacts such as noise, air quality, greenhouse gas emissions, vibration, and transportation impacts due to a smaller development footprint, although site-wide demolition and utility upgrades would still occur. It would also reduce the Proposed Project's transportation hazards impact, though it may not fully avoid it. However, because adaptive reuse of the General Hospital Building would not occur, impacts on historic resources could be greater, and mitigation measures would not necessarily reduce those impacts to less-than-significant levels. While Alternative C would maintain essential healthcare operations and allow for phased medical modernization, it would not include housing, commercial, or community-serving uses, and would therefore not achieve the broader planning, sustainability, or economic development goals of the Proposed Project. Aging infrastructure and limited redevelopment outside medical functions would also reduce long-term improvements in sustainability, resilience, and campus-wide integration.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the comparative analysis presented in Chapter 4, *Alternatives to the Proposed Project* of the Draft SEIR, Alternative B is identified as the Environmentally Superior Alternative. While this alternative would not meet all of the Proposed Project's objectives, with respect to providing a mix of housing, job opportunities, varied land uses, community benefits, and developing a comprehensive planning and entitlement framework, this alternative would result in fewer overall environmental impacts than Alternatives A and C. When weighing both

construction and operational impacts, Alternative B presents the most balanced and environmentally advantageous outcome among the alternatives evaluated.

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

- Reduce the magnitude of the Proposed Project's greatest impacts,
- Avoid the long-term environmental drawbacks of the No Project Alternative, and
- Provide meaningful environmental and historic benefits through reuse of the existing General Hospital Building and Los Angeles General Hospital–Acute Building Historic District.

ES.6 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the State CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft SEIR, the County issued a Notice of Preparation (NOP) on September 26, 2025. The CEQA-mandated scoping period for this Draft SEIR was between September 26 and November 21, 2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the Proposed Project. During this time, the County received comment letters from State and local agencies as well as the general public. Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft SEIR contains the NOP as well as the comments received by County in response to the NOP. The comments received during the NOP public review period and public scoping meeting are presented in Table 1-1, *Summary of Scoping Comments Received*.

Concerns raised in letters submitted to the County in response to the NOP include the following list. Though the concerns applicable to the CEQA process are addressed in this Draft SEIR, this list is not necessarily exhaustive; rather, it attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Bus service and transit-oriented development
- Impacts on traffic congestion
- Impacts on public services
- Impacts on noise
- Pedestrian and bicycle connectivity
- Impacts on nearby schools regarding air quality, hazards, noise, traffic, and pedestrian safety
- Impacts on population growth
- Impacts on emergency services
- Preservation of the medical library within the General Hospital Building

Section 15123(b)(3) of the State CEQA Guidelines requires that the Executive Summary also identify issues to be resolved. As lead agency, the County will consider whether this Draft SEIR satisfies the required findings for certification, including findings pertaining to the potential project alternatives and whether or how to mitigate significant impacts.

ES.7 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-2, *Summary of Significant Environmental Impacts and Mitigation Measures*, summarizes the conclusions of the environmental analysis in this Draft SEIR. Impacts are identified as significant, less than significant, or no impact, and mitigation measures are identified for all significant impacts. The level of significance after imposing the mitigation measures is also presented. A complete list of mitigation measures from the 2014 Master Plan EIR, along with proposed revisions is included in Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*.

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AESTHETICS (*The Proposed Project meets the criteria of Public Resources Code Section 21099(d)(1), and aesthetic impacts shall not be considered significant impacts on the environment. However, the Draft SEIR includes an evaluation of aesthetics for informational purposes only, to provide a complete record of the Proposed Project's visual context, demonstrate consistency with applicable design standards and policies, and inform the public about potential visual changes related to building height, massing, and site improvements.*)			
Significance Criterion a: Would the project have a substantial adverse effect on a scenic vista?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion b: Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion c: In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
applicable zoning and other regulations governing scenic quality?			
Significance Criterion d: Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
AIR QUALITY			
Significance Criterion a: Would the project conflict with or obstruct implementation of the applicable air quality plan? The Proposed Project's construction activities would be required to comply with requirements to minimize short-term emissions from on-road and off-road diesel equipment and would be required to comply with applicable regulations. Impacts would be less than significant.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
The Proposed Project's operation of future development under the Proposed Project would not conflict with or obstruct the implementation of the applicable air quality plan.			
Significance Criterion b: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? The Proposed Project's construction activities have the potential to result in a cumulatively considerable net increase in criteria pollutants. (**Impact AIR-1**) The Proposed Project's operational activities have the potential to result in a cumulatively considerable net	Potentially Significant (construction and operation)	**Construction** **Mitigation Measure AIR-1a:** To reduce volatile organic compounds (VOC) emissions during construction, the Project Applicant(s) (or its contractors) shall use paints with a VOC content that meets the South Coast Air Quality Management District Super Compliant architectural coatings standard of less than 10 grams per liter (g/L) for coating building architectural surfaces during construction. This measure shall be noted on all site and construction plans. **Mitigation Measure AIR-1b:** To reduce nitrogen oxide (NO_X) emissions during construction, the Project Applicant (or its contractors) shall implement the following measures during construction: ▪ Use construction equipment rated by the United States Environmental Protection Agency (USEPA) as having Tier 4 Final or higher exhaust emission limits for offroad equipment with engines 25 horsepower or higher. If Tier 4 Final equipment is not readily available, the contractor may apply other technologies available for construction	Less Than Significant (construction) Significant and Unavoidable (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
increase in criteria pollutants. (**Impact AIR-2**)		equipment such that it would achieve a comparable reduction in NOX and PM emissions comparable to that of Tier 4 construction equipment. Where alternatives to USEPA Tier 4 are utilized, the contractor shall be required to show evidence to the Project Applicant(s) that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit. ▪ Maintain a list of all operating equipment in use on the construction site during construction for verification by the County of Los Angeles Building and Safety Department. The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site. ▪ Haul and delivery truck idling times shall be minimized by shutting equipment off when not in use or reducing maximum idling time to less than three (3) minutes (beyond that required by 13 California Code of Resources [CCR] Chapter 10, Section 2485). Clear signage shall be provided for construction workers and construction vehicles at all access points. ▪ All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ A traffic control plan shall be prepared and provided to the County. ▪ A carpool program for construction workers, including incentivizing carpooling as well providing bus service for crew members shall be implemented. ▪ Truck deliveries shall be consolidated when possible. ▪ The combined vehicle miles traveled per day for offsite haul truck trips associated with demolition debris and earthen material export/import hauling operations shall not exceed 8,930 miles per day (equivalent to 180 one-way truck haul trips at 49.61 miles per one-way trip, which is the average distance to nearby serving landfills). The construction contractor(s) overseeing hauling operations shall log the number of daily haul truck loads and the one-way haul trip distance for each truck haul load of either demolition debris or earthen material for days in which truck hauling of these materials occurs. ▪ The individual requirements under this mitigation measure shall be noted on all site and construction plans. **Operation** Implement Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d.	
Significance Criterion c: Would the project expose sensitive	Potentially Significant	**Construction** Implement Mitigation Measure AIR-1b.	Less than Significant (construction)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
receptors to substantial pollutant concentrations? The Proposed Project's construction activities have the potential to generate emissions that would exceed applicable thresholds. (**Impact AIR-3**) The Proposed Project's warehouse and light industrial uses have the potential to generate on-site emissions that would exceed applicable thresholds (**Impact AIR-4**) The Proposed Project's warehousing and light industrial uses would generate operational TAC emissions from non-permitted sources that would exceed South Coast AQMD localized significance thresholds. (**Impact AIR-5**)	(construction and operation)	**Operation** **Mitigation Measure AIR-4a:** Future developer/facility owners for new development projects that would use off-road equipment (e.g., forklifts and yard trucks) in daily business operations shall only utilize electric-powered off-road equipment. The project developer/facility owner shall disclose this requirement to all tenants/business entities and provide written verification to the County prior to issuance of a Business License. In addition, the limitation to use only electric-powered off-road equipment shall be included in all leasing agreements. Prior to issuance of a Business License for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide a signed document (verification document) to the County noting that the project development/facility owner has disclosed to the tenant/business entity the requirement to use only electric-powered equipment for daily operations. This verification document shall be signed by authorized agents for the project developer/facility owner and tenant/business entities and retained and posted by the Business License by the facility owner onsite. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the County to verify, to the County's satisfaction, that any off-road equipment utilized will be electric-powered. **Mitigation Measure AIR-4b:** Future developer/facility owners for new development projects that would use transport refrigeration	Significant and Unavoidable (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		units (TRUs) in daily business operations use only electric standby and/or hybrid electric TRUs (E/S TRUs). All E/S TRUs shall comply with the California Air Resources Board's "Alternative Technology" requirements under Section 2477(e)(1)(A)(3) of the California Code of Regulations, Title 13, Article 8, Chapter 9, Division 3. The project developer/facility owner shall disclose this requirement to all tenants/business entities prior to the signing of any lease agreement. In addition, the limitation to use only E/S TRUs shall be included in all leasing agreements. Prior to issuance of a Business License for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide a signed document (verification document) to the Los Angeles County Department of Regional Planning noting that the project development/facility owner has disclosed to the tenant/business entity the requirement to use only E/S TRUs for daily operations. This verification document shall be signed by authorized agents for the project developer/facility owner and tenant/business entities. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the Los Angeles County Department of Regional Planning to verify, to the County's satisfaction, that any TRUs utilized will be E/S TRUs. **Mitigation Measure AIR-4c:** To reduce idling emissions from transport trucks, future project developer/facility owners for new warehousing or general industrial development projects place	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		signage at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations (e.g., Rule 2485). At minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict nonessential idling to no more than two consecutive minutes (compared to five minutes currently allowed under Rule 2485); and 3) telephone numbers of the building facilities manager and CARB to report violations. All signage shall be made of weatherproof materials. All site and architectural plans submitted to the County shall note the locations of these signs. Prior to issuance of the Certificate of Occupancy, the Los Angeles County Building & Safety Division shall verify the installation of these signs.	
Significance Criterion d: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? The Proposed Project's construction activities would result in short-term construction related odors that would cease upon the drying or hardening of odor-producing materials.	Less Than Significant (construction) Potentially Significant (operation)	**Mitigation Measure AIR-6:** Prior to discretionary approval by the County of Los Angeles, if it is determined that a development project has the potential to emit nuisance odors , an odor management plan shall be prepared by the Project Applicant(s) and submitted to the Los Angeles County Department of Regional Planning for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to: ▪ Wastewater treatment plants ▪ Composting, green waste, or recycling facilities ▪ Fiberglass manufacturing facilities ▪ Painting/coating operations ▪ Large-capacity coffee roasters	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impacts would be less than significant. The Proposed Project's industrial land uses have the potential to generate an odor nuance. (**Impact AIR-6**)		▪ Food-processing facilities The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors and be submitted to the County. The Odor Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the project's design and on site plan(s).	
BIOLOGICAL RESOURCES			
Significance Criterion a: Would the project have a substantial 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?	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Measure BIO-1: Mitigation for Impacts to Special-Status Bats**. To avoid impacts on roosting bats, preconstruction surveys shall be conducted by a qualified bat biologist prior to the on-set of construction within the vicinity of vacant buildings and prior to tree removal. During surveys, biologists shall avoid unnecessary disturbance of potentially occupied roosts. Full-spectrum acoustic detectors shall be used during emergence surveys to assist in species identification. If it is determined that trees or structures in the project area are being used by bats as roost sites, the following protective measures shall be implemented: ▪ Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Individual development projects and implementation activities under the Proposed Project that require removal of on-site trees or other potential roost sites would result in a potentially significant impact to roosting special-status bats. **(Impact BIO-1)** Operational activities would not have an adverse effect on special status species because implementation of the Proposed Project would not differ significantly from current operational activities.		roosts, tree trimming or removal) shall not occur during the maternity period (April 15 to September 15) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost shall remain undisturbed from the time it is located until the following September 15 or until a qualified biologist has determined the roost is no longer active. No construction work shall occur at the roost or within a 100-foot buffer zone (or an alternative buffer zone, as determined by the biologist) until September 15. ▪ Exclusion devices may be installed outside of the maternity period (September 16 to April 14) to preclude bats from occupying buildings during or prior to the on-set of construction. Exclusionary devices shall be installed only by or under the supervision of an experienced bat biologist. Eviction of bats roosting in trees outside the maternity season shall be done in favorable weather under the supervision of a qualified bat biologist and adhering to the following two-step removal process: ▪ On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree that may not have been detected during the preconstruction survey, will either abandon the roost	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed. ▪ Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to the California Department of Fish and Wildlife (CDFW). ▪ Non-maternity roost trees should ideally be removed or trimmed in the fall between September 16 and October 31. If the removal or trimming of non-maternity roost trees cannot be timed to occur within this period, tree trimming and removal of non-maternity roost trees shall be timed to avoid periods of inclement or unseasonably cold weather to avoid impacts on bats in torpor (a period of seasonal inactivity). In all circumstances, qualified biologists shall monitor non-maternity tree removal.	
Significance Criterion b: Would the project 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	No Impact (construction and operation)	None	No Impact (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Department of Fish and Wildlife or U.S. Fish and Wildlife Service? No riparian habitat or federally protected surface waters, wetlands, or other aquatic resources are located within or immediately adjacent to the Project Site.			
Significance Criterion c: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? No federally protected wetlands are within or immediately adjacent to the Project Site.	No Impact (construction and operation)	None	No Impact (construction and operation)
Significance Criterion d: Would the project interfere substantially with the movement of any native	Potentially Significant (construction)	**Mitigation Measure BIO-2: Mitigation for Impacts to Nesting Birds.** Construction activities shall avoid the nesting season for birds to the extent feasible, or conduct preconstruction nesting bird surveys if construction activities are carried out during the	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
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? Construction activities associated with the Proposed Project would have the potential to affect nesting birds. **(Impact BIO-2)** The Proposed Project's operational uses are not anticipated to not 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.	Less Than Significant (operation)	nesting season. To ensure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), the Project Applicant(s), or through the general contractor(s), shall conduct all vegetation removal during the non-breeding season, between September 1 and January 31, or implement the following: If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 1 and August 31, the County or contractor shall retain a qualified biologist (i.e., experienced with conducting nesting bird surveys) who shall conduct a focused nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating construction activities within any potential nesting habitat (all vegetation, buildings, eaves on buildings, etc.). The size of the nesting bird survey area shall be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It may also include a buffer area if deemed necessary by the qualified biologist. The preconstruction nesting bird surveys shall be conducted no more than seven days prior to initiation of vegetation removal, building demolition activities, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on Project activities are necessary. If active nests are found, a qualified biologist shall identify and flag an appropriate buffer around the nest, and no construction	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		activities shall occur within the buffer until the qualified biologist has determined that young have fledged or the nest is no longer active. The specific buffer width shall be determined by a qualified biologist at the time of discovery and vary according to the bird species, site conditions, and the type of work activities to be conducted. The survey results shall be submitted to the County of Los Angeles Department of Public Works for review and approval of the recommended nest buffer areas, if any, prior to commencement of any vegetation removal, building demolition, or noise-generating construction activities on the Project Site.	
Significance Criterion e: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Construction and operation of the Proposed Project could result in encroachment into the root protection zones or removal of protected coast live oak trees. Operation of facilities under the Proposed Project, including routine maintenance	Potentially Significant (construction and operation)	**Construction** **Mitigation Measure BIO-3: Mitigation for Impacts to Protected Trees.** Prior to removal, relocation, or maintenance of protected oak trees, a qualified arborist shall inventory and evaluate the health of protected oak trees on the Project Site and evaluate the potential for impacts. If the arborist determines that the proposed activity would cut, destroy, remove, relocate, inflict damage, or encroach into a protection zone of a protected oak tree, the Project Applicant shall submit an application for approval to the Los Angeles County Department of Regional Planning and obtain approval prior to impacting a protected oak tree. The Project Applicant(s) shall be required to implement the conditions of approval, including planting and care of replacement trees and protections for non-impacted oak trees. When planting replacement trees is required, replacement trees	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
and pruning of vegetation and trees, has the potential to impact oak trees that are protected under the County's Oak Tree Ordinance. **(Impact BIO-3)**		shall be in the ratio of two trees planted for each tree impacted. Replacement trees shall be indigenous oak species and shall be at least 15-gallon size and measure at least one inch in diameter one foot above the base. Replacement trees shall be properly cared for and maintained for two years and replaced if they die within that period. **Operation** Implement Mitigation Measure BIO-3.	
Significance Criterion f: Would the project conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan? There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal level for the Project Site or adjacent areas.	No Impact (construction and operation)	None	No Impact (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
CULTURAL RESOURCES			
Significance Criterion a: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? During construction, the Proposed Project has the potential to impact adjacent resources through new construction outside the Los Angeles General Hospital–Acute Unit Historic District boundary. New implementing construction projects may impact adjacent historical resources if they are incompatible with the scale, massing, height, or style of adjacent resources; if they result in diminished integrity of adjacent resources (specifically, setting and/or feeling); or if they result in vibration impacts	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Program for Adjacent New Construction** If a new construction project is proposed for a site within 50 feet of an eligible or designated historical resource, then the Project Applicant(s) shall apply Mitigation Measure CUL-1a (Secretary Standards Compliance) and engage a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the project is adjacent to the resource (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions). If the new construction is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the new construction is found to be adjacent to the identified resource, the Architectural Historian/Historic Architect shall assess the project, focusing on the application of Standards No. 9 and 10, both of which relate to adjacent new construction. If the Architectural Historian concludes that the new construction project meets the Standards, then the project is presumed to not have an impact on historical resources. During implementation of the project, the Project Applicant(s) shall apply Mitigation Measure CUL-1b (Project Review During Design and Construction) and engage a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional	Significant and Unavoidable (construction) Less Than Significant (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
to adjacent resources. **(Impact CUL-1)** Operation of the Proposed Project at the Project Site is not anticipated to result in a substantial adverse change in the significance of historic resources. The Proposed Project would help to maintain the historical significance of the General Hospital Building through routine maintenance.		Qualifications Standards to review milestone drawings and generally be available to the design team, as needed. If the proximity of new construction to historical resources is such that vibration during construction may cause them physical damage, as defined through Mitigation Measure NOI-4, the Project Applicant(s) shall also apply Mitigation Measure CUL-1c (Protection During Construction) and engage a qualified Historic Architect and Structural Engineer to prepare a Conditions Assessment Report and Construction Monitoring Plan. **Mitigation Measure CUL-1a:** Secretary Standards Compliance. For all instances in which a project is implementing activities under the Proposed Project within 50 feet of an eligible or designated historical resource identified in this Draft SEIR, the Project Applicant shall engage the services of a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the future implementing project activity is adjacent to the identified historical resource (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions). If the future implementing project activity is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the future implementing project activity is determined to be adjacent to the identified historical resource,	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		the Architectural Historian/Historic Architect shall conduct an assessment of whether the proposed treatment of the historical resource complies with the Secretary of the Interior's Standards for Rehabilitation ("the Rehabilitation Standards"). If the future implementing project activity is found to not be in compliance with the Rehabilitation Standards, then the Architectural Historian/Historic Architect shall provide recommendations for how to modify the design, siting, scale, massing, or architectural treatment of the future implementing development projects to the extent feasible to bring it into compliance, or as close to compliance as feasible, which shall be integrated into the design of the Proposed Project. The professional shall prepare a memorandum or equivalent level of documentation conveying the findings of the assessment, which shall be provided to the County. **Mitigation Measure CUL-1b:** Project Review During Design and Construction. For instances in which a future project involves adjacency to a historical resource (as determined under Mitigation Measure CUL-1a), the Project Applicant(s) shall engage the services of a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to review milestone drawing sets and generally be available to the design team during design and construction. The Architectural Historian/Historic Architect shall review Design Development (DD) and Construction Documentation (CD) drawing sets at 50% and 100% completion and provide a brief memo regarding ongoing project compliance	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		with the Standards. Project review during construction shall occur quarterly and reported in memo format, which shall be provided to the County. **Mitigation Measure CUL-1c:** Protection During Construction. Prior to the commencement of construction activities within proximity to, as defined in Mitigation Measure NOI-4, a historical resource, a Conditions Assessment Report will be completed by a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to identify baseline conditions (cracks, deterioration, etc.). The report will be provided to the County. As part of this process, a Structural Engineer shall be consulted to determine whether any shoring or protection should be installed prior to commencement of construction activities. In addition, the Project Applicant(s) shall engage a Civil Engineer to prepare an Adjacent Building Construction Monitoring Plan ("Monitoring Plan"). The Monitoring Plan shall establish survey monuments and document and record the positions of adjacent buildings, structures, sidewalks, utilities, facades, and surface features to form a baseline for determining settlement or deformation. The Monitoring Plan shall include the following provisions: (1) shored excavation and adjacent buildings, structures, sidewalks, utilities, facades, and cracks shall be visually inspected at a minimum of one time per month; (2) survey monuments shall be measured at critical stages of	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		excavation, shoring, dewatering, and construction but should not occur less frequently than once every thirty days; (3) monitoring reports shall be prepared by an appropriate technical professional California Professional Land Surveyor documenting the movement monitoring results and distributed to all appropriate parties, including the shoring engineer. The County shall be provided all documentation and be notified if movement exceeds predetermined thresholds and calculated amounts as required.	
Significance Criterion b: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? Although the Project Site is located within an urbanized and disturbed area of the City, there is a potential for previously undiscovered archaeological resources to be present beneath the Project Site. **(Impact CUL-2)**	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Measure CUL-2:** Prior to any demolition, grading, or excavation related to the construction of facilities or improvements under the Proposed Project, a qualified archaeologist shall be retained by the Project Applicant(s) to determine which areas shall require cultural resources monitoring during initial ground disturbance. The location of construction activities that are likely to encounter subsurface sediments with archaeological sensitivity shall be determined by the qualified archaeologist upon review of project excavation and grading plans. If determined necessary by the qualified archaeologist, monitoring by a qualified archaeologist shall be conducted during all initial ground disturbing activities (e.g. grading, removal of foundations, utility trenching, installation of shoring/piles, etc.) within the Project Site, from ground surface level to bedrock.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Operation of the Proposed Project at the Project Site would not result in activities that would disturb native soils.		If, during cultural resources monitoring, the archaeologist determines that the sediments being excavated have been previously disturbed and are unlikely to contain significant cultural materials, the archaeologist shall request that monitoring be reduced or eliminated. Spot-check monitoring shall occur during all construction, on a schedule determined by the project archaeologist. If buried cultural resources such as trash deposits, building foundations, privy pits, flaked or ground stone, or human remains are inadvertently discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find and the area shall be secured to prevent disturbance. The County will be notified immediately. A qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to evaluate the significance of the find and recommend appropriate treatment measures. If the discovered materials are determined to be significant cultural resources, the archaeologist shall develop and implement an appropriate treatment plan, which may include avoidance, preservation in place, capping with fill material, or data recovery through excavation and documentation. The Treatment Plan shall be provided to the County. Work in the vicinity of the discovery, as determined by the qualified archaeologist, shall not resume until the archaeologist has determined that appropriate measures have been implemented. Treatment measures for	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		items that are not associated with human remains typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. If human remains are encountered, work shall halt in accordance with California Health and Safety Code Section 7050.5 and the County of Los Angeles Medical Examiner (Medical Examiner) shall be notified immediately. If the Medical Examiner determines that the remains are Native American, the Medical Examiner shall notify the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall designate a Most Likely Descendant (MLD). The MLD shall be provided the opportunity to make recommendations regarding the treatment and disposition of the remains in accordance with Public Resources Code Section 5097.98.	
Significance Criterion c: Would the project disturb any human remains, including those interred outside of dedicated cemeteries? Ground-disturbing activities have the potential to unearth human remains. Should human remains be uncovered during construction, those remains	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
would require proper treatment in accordance with applicable laws, including Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98 require that there be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. Operation of the Proposed Project at the Project Site is not anticipated to affect human remains as the Proposed Project's operational activities are not anticipated to disturb native soils.			
ENERGY			
Significance Criterion a: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
resources, during project construction or operation? The Proposed Project would result in per capita electricity, natural gas, and gasoline and diesel fuel consumption rates below the County average under both the mixed-fuel design scenario and the all-electric design scenario.			
Significance Criterion b: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? Construction and operation of the Proposed Project would comply with the Energy Action Plan, County of Los Angeles 2045 CAP, and the Long-Term Energy Efficiency Strategic Plan.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
GEOLOGY AND SOILS			
Significance Criterion a: Would the project subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.) ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction iv) Landslides. The active Upper Elysian Park blind thrust fault is	Potentially Significant (construction and operation)	**<u>Construction and Operation</u>** **Mitigation Measure GEO-1:** Prior to any structural improvements to buildings or prior to any excavation related to the construction of new facilities, detailed subsurface geotechnical evaluations shall be performed to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction. The Project Applicant(s) or its designee shall ensure that all recommendations contained in the approved geotechnical reports are incorporated into final design plans and implemented during construction. All recommendations shall be implemented. The geotechnical evaluation(s) shall include the following measures, at a minimum, to address potential seismic ground shaking, liquefaction, and slope stability hazards. These components establish required baseline evaluation criteria. However, the licensed geotechnical engineer(s) shall identify and incorporate any additional site-specific design and construction recommendations necessary based on the results of subsurface investigations conducted for each development phase. All recommendations shall be provided to the County, be incorporated into final engineering plans, and implemented during construction. Recommendations could include but are not limited to: ▪ **Seismicity:** Structural elements of future improvements shall be designed to resist or accommodate appropriate	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
approximately 0.4 mile north of the approximate center of the Project Site. Thus, lurching or cracking of the ground surface as a result of nearby seismic events is a possible and potentially significant impact. Strong seismic ground shaking represents a potentially significant impact, particularly for retained buildings that are not designed to current seismic standards. Therefore, seismic ground shaking is potentially significant. The risk of damage from liquefaction and seismic settlement could occur under the Proposed Project due to the presence of young alluvial soils and shallow groundwater in portions of the Project Site. The probability of seismically induced landslides on the Project Site is considered remote. **(Impact GEO-1)**		site-specific ground motions and conform to the current seismic design standards. ▪ **Liquefaction:** An assessment of the liquefaction potential shall be made prior to detailed design and construction of project improvements. Structural design and preventative techniques, such as in situ ground modification or supporting foundations with piles at depths designed specifically for liquefaction, shall be included. To evaluate the potential for liquefaction, subsurface evaluation may be performed. Site-specific geotechnical evaluations that assess the liquefaction and dynamic settlement characteristics of the on-site soils shall include the drilling of exploratory borings, evaluation of groundwater depths, and laboratory testing of soils. Methods for construction in areas with a potential liquefaction hazard may include in situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements on piles at depths designed specifically for liquefaction. Pile foundations can be designed for a liquefaction hazard by supporting the piles on dense soil or bedrock below the liquefiable zone or employing other appropriate methods, as evaluated during the Project Site-specific evaluation. Additional recommendations to address liquefaction may include densification by	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		installation of stone columns, vibration, deep dynamic compaction, and/or compaction grouting. ▪ **Slope Stability:** An assessment of slope stability shall be made prior to detailed design and construction of project improvements and design techniques, such retaining walls and drainage improvements, shall be implemented as needed. Slopes created or modified as part of the Proposed Project shall be engineered to reduce the potential for slope instability. The geotechnical evaluation(s) shall include the following measures to address and resolve site-specific unstable soil impacts: ▪ **Groundwater:** Excavations for foundations in areas with shallow perched groundwater may need to be cased/shored and/or dewatered to maintain stability of the excavations and provide access for construction. All recommendations included in the preliminary geotechnical evaluations pertaining to groundwater shall be followed. Excavations for underground structures shall be performed with care to reduce the potential for lateral deflection of excavation sidewalls and/or shoring, which may also cause differential movement of structures located near the excavation.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Further study, including subsurface exploration, shall be performed during the detailed design phase of future improvements to evaluate the presence of groundwater, seepage, and/or perched groundwater at the Project Site and the potential impacts on design and construction of project improvements. An assessment of the potential for shallow groundwater shall be made during the design phase of each project, and design techniques shall be developed as necessary. ▪ **Collapsible Soils/Settlement:** An assessment of the potential for soils that are prone to settlement shall be made prior to detailed design and construction of project improvements, and design techniques shall be developed, as appropriate, to reduce impacts related to settlement to low levels. During the detailed design phase of the project, surface reconnaissance and site-specific geotechnical evaluations shall be performed to assess the settlement potential of the on-site natural soils and undocumented fill. This may include detailed surface reconnaissance to evaluate site conditions, drilling of exploratory borings or test pits, and laboratory testing of soils, where appropriate, to evaluate site conditions. Prescribed approaches to address potential soil	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		settlement could include either removal of the compressible/collapsible soil layers and replacement with compacted fill, surcharging to induce settlement prior to construction of improvements, allowing for a settlement period after or during construction with new fills, or a specialized foundation design, including the use of deep foundation systems to support structures. Varieties of in situ soil improvement techniques are also available, such as dynamic compaction (heavy tamping) or compaction grouting. The geotechnical evaluation(s) shall include the following measures to address and resolve site-specific expansive and corrosive soils hazards: ▪ **Expansive Soils:** Mitigation techniques to reduce expansive soil potential shall be included as necessary. Techniques shall include over excavation and replacement with non-expansive soil, soil treatment, moisture management, and/or a specific structural design for expansive soil conditions developed during the design phase. ▪ **Corrosive Soils:** An assessment of the potential for corrosive soils shall be made during the detailed design phase of the project through soil testing procedures. Engineering methods shall be developed, as appropriate, to reduce impacts related to corrosive soils to low levels. Subsurface evaluation, including laboratory testing, shall	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		be performed. Evaluation of the corrosive soil potential shall be accomplished through testing and analysis of soils at foundation design depths. The laboratory tests conducted on the soils prior to construction and improvement plan preparation shall include corrosivity tests. Review of these data by a corrosion engineer, if determined necessary in the geotechnical evaluation, shall result in corrosion protection measures that address site-specific conditions. Evaluation of the potential corrosive soils hazard shall be performed prior to detailed design and construction so that, in the event the hazard exists, design techniques may be implemented. To avoid site-specific subsurface evaluation, corrosion protection measures may be included in the initial design for the proposed project improvements. Depending on site-specific conditions presented geotechnical evaluation, recommendations for corrosive soil conditions may involve the use of concrete that is resistant to sulfate exposure. Corrosion protection for metals may be needed for underground foundations or structures in areas where corrosive groundwater or soil could cause deterioration. Typical design techniques include epoxy and metallic protective coatings, the use of alternative (corrosion-resistant) materials, and selection of the appropriate type of cement and water/cement ratio.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project result in substantial soil erosion or the loss of topsoil? Required NPDES/SWPPP measures, building code compliance, and site-specific geotechnical recommendations would control construction-related erosion. Operationally, engineered drainage, LID features, and required BMPs would effectively manage runoff on the Site's steep slopes and landscaped areas.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion c: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Potentially Significant (construction and operation)	**Construction and Operation** Implement Mitigation Measure GEO-1.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Mapped areas of subsidence were not found in the City or County of Los Angeles reference materials. Therefore, the potential for subsidence on the Project Site is relatively low. Given these conditions and the anticipated depth of excavation for proposed structures and utilities, groundwater could be encountered during construction. Therefore, groundwater impacts would be potentially significant. Given the extent of demolition, excavation, and reconstruction planned across the Project Site under the Proposed Project, these conditions could result in localized ground movement and structural distress if not addressed. **(Impact GEO-2)**			
Significance Criterion d: Would the project be located on expansive soil, as defined in	Potentially Significant	**Construction and Operation** Implement Mitigation Measure GEO-1.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? Pockets of clay-rich alluvium and weathered Puente Formation bedrock may be present on the Project Site, and would present a low to moderate expansion risk. **(Impact GEO-3)**	(construction and operation)		
Significance Criterion e: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? The Proposed Project would not require the use of septic tanks or alternative wastewater disposal systems.	No Impact (construction and operation)	None	No Impact (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion f: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? The Proposed Project's construction and demolition activities have the potential to encounter paleontological resources beneath fill soils. **(Impact GEO-4)**	Potentially Significant (construction) No Impact (operation)	**Mitigation Measure GEO-4: Paleontological Resources.** Prior to any excavation related to the construction of facilities or improvements proposed under the master plan, a qualified vertebrate paleontologist with a graduate degree in paleontology, geology, or a closely related earth science discipline, and more than 10 years of experience shall be retained by the Project Applicant(s) or construction contractor. Final excavation depths, locations, and construction methods shall be determined during subsequent project-level design. Accordingly, the qualified paleontologist shall review project-specific excavation and grading plans prior to construction and identify areas where monitoring is required based on the depth and extent of excavation into paleontologically sensitive geologic units (e.g., older alluvium or Puente Formation). Monitoring shall be implemented by the qualified paleontologist during ground disturbance in those identified areas. Very shallow surficial excavations (i.e., less than 5 feet in depth) within areas of previous disturbance or areas of Quaternary younger alluvial deposits shall be monitored by the qualified paleontologist to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring. If future excavations take place in Quaternary older alluvial deposits or within Fernando or Puente Formation bedrock, such excavations shall be monitored on a full-time basis by a qualified	Less Than Significant (construction) No Impact (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		paleontological monitor and under the supervision of the qualified paleontologist. The paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are, upon exposure and examination by qualified paleontological personnel, determined to have a low potential for containing fossil resources. The paleontological monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall have authority to temporarily divert grading away from exposed fossils to recover the fossil specimens professionally and efficiently and collect associated data. All efforts to avoid delays in project schedules shall be made. To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured,	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		and appropriate sediment samples shall be collected and submitted for analysis. Fossils collected, if any, shall be transported to a paleontological laboratory for processing where they shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility that meets federal and State curation standards and is approved in writing by the County of Los Angeles. Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared by the qualified paleontologist within a reasonable timeframe from the completion of recovery. The report and inventory, when submitted to the County along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts on paleontological resources.	
GREENHOUSE GAS EMISSIONS			
Significance Criterion a: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Implementation of the Proposed Project would result	Potentially Significant (construction and operation)	**<u>Construction and Operation</u>** **Mitigation Measure GHG-1a:** For development projects that include parking (e.g., private garages, surface parking lot, etc.), the Project Applicant(s) shall implement the following provisions of the California Green Building Standards Code (CALGreen) as mandatory and not voluntary and shall list and identify them on all prepared building and site plans. The Project Applicant shall submit these building and site plans that note the applicable	Significant and Unavoidable (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
in emissions that would exceed the South Coast Air Quality Management District bright-line greenhouse gas significance threshold. (**Impact GHG-1**)		measures to the County of Los Angeles Building and Safety Department prior to the issuance of construction permits. • **Residential Structures with Three or Fewer Stories**. For residential land uses with three or fewer stories, the project developer(s) shall: o Design and build condominium/townhouses dwellings that have an attached private garage to have a dedicated electric circuit to support electric vehicle charging, as outlined in the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.1. o Design and build residential buildings to, at a minimum, meet the Tier 2 electric vehicle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.2.1. • **Nonresidential Structures and Residential Structures with Four or More Stories.** For nonresidential land uses and residential land uses that are four or more stories, the applicant/developer(s) shall: o All parking areas shall be designed to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces shall equal the Tier 2	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.1.2. o Parking areas shall be designed to provide electric vehicle (EV) charging stations. At minimum, the number of EV charging stations shall comply with the Tier 2 Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.3.3 or Section A5.106.5.3.4. **Mitigation Measure GHG-1b:** Each applicant shall demonstrate a minimum 10 percent reduction in energy consumption below energy baseline. For the General Hospital, ASHRAE Standard 90.1-2010 shall be the energy baseline. For all other new construction and major renovation, the 2025 version of Title 24, Part 6 shall be the energy baseline. "New construction" in this context shall mean "ground up" development of a structure that has never been occupied. "Major renovation" in this context shall include additions to or redevelopment of existing structures resulting in an increase of over fifty (50) percent of the existing floor area. An overall energy reduction of 10 percent shall be demonstrated on an aggregate basis across the Project Site, allowing for some buildings to perform better than others. Compliance shall be demonstrated via: • A technical memorandum (where energy reductions might be below 10% for individual buildings); or	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		• Title 24 compliance forms submitted at the time of permit (where energy reductions are above 10%); or • An energy modeling report (for the General Hospital). The technical memorandum shall be based on a project site-level energy calculation and reference Title 24 compliance forms where completed and available, and submitted to the County prior to issuance of each building permit. The 10 percent reduction in energy consumption may be achieved through a combination of Project Site-wide renewable energy generation, energy distribution systems, electrification, and/or building design features. The Project Site area energy calculations shall be based on new developments pursuant to the project. The Project Site-level energy calculations shall be updated as needed throughout phased development to reflect actual design progress. Where performance of an individual building or phase is below the 10 percent requirement, it will address anticipated performance in future phases to achieve the aggregate 10 percent reduction. Should the final development phase proposal show that the Project Site-wide 10 percent reduction in energy consumption was not achieved, the final phase development proposal shall include additional measures to ensure the Project Site-wide 10 percent reduction in energy consumption from the electrical grid be achieved. The "final development phase" is the phase that would complete the full buildout of the Project Site within the	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		anticipated 25-year development horizon. If such phase is not realized within the 25-year development horizon, then the Proposed Project shall demonstrate the Project Site-wide 10 percent reduction no later than December 31st, 2050 through the implementation of additional measures. These additional measures may include but are not limited to photovoltaic arrays, appliance or mechanical system upgrades to new or existing buildings, or lighting upgrades on new or existing structures. Any such additional measures shall be quantified for energy consumption reduction performance and submitted to the County for approval prior to the issuance of construction permits for the final phase proposal. **Mitigation Measure GHG-1c:** For nonresidential development projects, prior to issuance of the certificate of occupancy, the property owner shall provide documentation to the County of Los Angeles Building and Safety Department demonstrating enrollment in a 100 percent carbon-free electricity energy plan, such as the City of Los Angeles Department of Water and Power's Green Power for Green LA program, for Proposed Project building(s) if such plan is available. If a 100 percent carbon-free electricity plan is not available, the project developer(s)/County shall enroll in an energy plan with the next highest carbon-free electricity until a 100 percent carbon-free electricity energy plan becomes available. Measures to achieve 100 percent carbon-free electricity use may include, but are not limited to, plans for 100 percent renewable electricity. If such carbon-free electricity energy plans are waitlisted, the Project Applicant may enroll in an	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		available energy plan in the meantime, but shall sign up for the waiting list until such time a carbon-free electricity energy plan is available. Implement Mitigation Measure TRA-3d.	
Significance Criterion b: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? The Proposed Project would not conflict with applicable strategies and regulations to reduce greenhouse gas emissions. Impacts would be less than significant.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
HAZARDS AND HAZARDOUS MATERIALS			
Significance Criterion a: Would the project create a significant hazard to the public or the environment through the routine transport, use, or	Potentially Significant (construction and operation)	**Construction** **Mitigation Measure HAZ-1a**: In order to minimize exposure, prior to demolition activities, asbestos-containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated. Hazardous building materials surveys have been conducted for many Project	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
disposal of hazardous materials? Construction and phased demolition of existing buildings and structures would involve the routine handling, transport, and disposal of hazardous materials. Investigations across the Project Site have confirmed the presence of ACMs, LBPs, petroleum hydrocarbons, VOCs, methane, undocumented fill containing demolition debris, and an idle oil well, as well as limited occurrences of low-level radioactive waste associated with former medical and laboratory activities. **(Impact HAZ-1).** Operational hazardous materials use would include medical and laboratory supplies, cleaning agents, maintenance products, fuels, and small quantities of commercial and household products. Biomedical and		Site structures; however, because demolition would occur in phases and certain materials are concealed within wall assemblies, mechanical systems, and other building components that cannot be fully accessed until demolition preparation activities occur, final comprehensive pre-demolition surveys consistent with South Coast Air Quality Management District (AQMD) Rule 1403 shall be completed immediately prior to demolition of each structure. Abatement measures shall be implemented in accordance with the recommendations of these evaluations. Asbestos surveys shall be conducted in accordance with South Coast AQMD Rule 1403, which specifies that all surveys are to be carried out by a Cal/OSHA-certified asbestos consultant and will follow established survey protocols, notification, and work practice requirements. Lead-based paint surveys shall be carried out by a California Department of Public Health (CDPH)–certified inspector/assessor. If necessary, a lead abatement plan would be prepared by the CDPH-certified project monitor or supervisor and be implemented during demolition and renovation activities. Demolition activities would be performed by CDPH-certified workers. **Mitigation Measure HAZ-1b:** Prior to start of construction, construction activities that involve subsurface disturbance within areas of the Project Site where residual petroleum hydrocarbons and volatile organic compounds (VOCs) in groundwater have been identified or are reasonably expected to be present, including areas downgradient of the former leaking underground storage tank (LUST) location at 1200 North State Street shall	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
medical waste generated by hospital functions would continue to be produced during long-term operation and must be managed as part of ongoing campus activities. **(Impact HAZ-2)**		account for residual petroleum hydrocarbons and VOCs in groundwater that remain following regulatory closure of the former leaking underground storage tank case. A qualified environmental professional shall evaluate the potential for vapor encroachment conditions (VEC) and specify appropriate management measures, which may include removal and disposal of contaminated soil, groundwater management, vapor mitigation, or other remedial actions, consistent with regulatory requirements and recommendations of the Phase II ESA. The management measures shall be implemented during soil disturbing activities. **Mitigation Measure HAZ-1c:** Prior to construction, the Project Applicant(s) shall conduct additional confirmatory subsurface investigations in areas of known or suspected concern identified in the completed Phase II Subsurface Investigation and Methane Survey, including former and suspected underground storage tank locations, both those abandoned in place and those without verified removal documentation, as well as former boiler and powerhouse areas. Because prior investigations were limited to accessible areas and did not include full site-wide excavation or investigation beneath existing structures, utilities, and active facilities, the extent of residual contamination cannot be fully characterized until demolition and site access occur. Therefore, additional confirmatory investigation shall be completed prior to grading in each affected area to fully delineate any residual contamination. These investigations shall evaluate whether residual contamination remains that could affect redevelopment.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		If additional residual contamination is found, a qualified geologist or industrial hygienist shall recommend appropriate remedial actions, which may include removal, disposal, or remediation of affected soils or structures, consistent with regulatory requirements. These remedial actions shall be implemented during construction. **Mitigation Measure HAZ-1d:** The documented abandoned oil well on the southern portion of the Project Site (Santa Fe Springs Mutual Oil Syndicate Well No. 1, API No. 0403705846) shall be further evaluated by a qualified petroleum engineer or geologist prior to any ground-disturbing activities, including grading, excavation, or construction, occurring within 100 feet of the well location. The evaluation shall include confirmation of the well's current condition and abandonment status through review of regulatory records and, if necessary, field investigation field investigation to verify that the well meets current CalGEM abandonment standards. Because existing structures, pavement, utilities, and active campus operations currently limit full access to the well location and its area of potential influence, comprehensive field verification and intrusive investigation cannot be completed at this time. The final grading limits, excavation depths, and site access conditions will not be fully known until demolition and site clearance activities occur. Therefore, confirmation of abandonment status and any necessary subsurface investigation	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		must occur immediately prior to grading in the affected area, once safe and unobstructed access is available. If the evaluation determines that the well has not been properly abandoned in accordance with CalGEM standards, the well shall be plugged or otherwise remediated in compliance with Public Resources Code Sections 3208 to 3217 prior to grading in the affected area. No grading or construction activities shall occur within the 100-foot radius (area of potential influence) of the well until CalGEM has confirmed that the well meets current abandonment standards. **Operation** **Mitigation Measure HAZ-2:** Prior to the issuance of building permits for any new residential or commercial structure on portions of the Project Site where volatile organic compounds (VOCs) in soil vapor have been documented above applicable screening levels, the Project Applicant(s) shall prepare and implement a vapor intrusion mitigation plan. The plan shall include site-specific engineering controls, such as passive or active sub-slab depressurization systems, vapor barriers, or equivalent measures designed to prevent intrusion of VOCs into occupied indoor spaces.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Because final building footprints, foundation designs, and finished grades have not yet been determined, a structure-specific vapor mitigation system cannot be finalized at this time. Therefore, the vapor intrusion mitigation plan shall be prepared for each applicable structure once final design plans are available and prior to permit issuance. The vapor intrusion mitigation plan shall be prepared by a qualified environmental professional in consultation with the Los Angeles Department of Building and Safety (LADBS) as the permitting authority, and, as applicable, Los Angeles County Public Works, and the Los Angeles Regional Water Quality Control Board (RWQCB). Design features shall comply with City of Los Angeles Methane Zone requirements, CalEPA guidance, and RWQCB performance standards for VOC mitigation. Implementation of the plan, including installation of all required engineering controls, shall be verified through inspections and post-installation testing prior to occupancy. LADBS, in coordination with the RWQCB, shall review and approve the plan, confirm proper installation, and enforce compliance as part of the standard building permit and inspection process.	
Significance Criterion b: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions	Potentially Significant (construction and operation)	**Construction** Implement Mitigation Measures HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2. **Operation** Implement Mitigation Measure HAZ-2.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
involving the release of hazardous materials into the environment? Construction and phased demolition would involve activities with an elevated potential for accidental release of hazardous materials, including removal and handling of ACMs and LBP from aging structures and tunnels documented to contain friable ACM and deteriorated mechanical systems. **(Impact HAZ-3)** Operation would involve the continued use, storage, and on-site transfer of hazardous materials associated with hospital and medical functions (including biomedical wastes), laboratories, maintenance activities, and other campus uses that routinely employ chemicals, solvents, fuels, and			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
related products. **(Impact HAZ-4).**			
Significance Criterion c: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school? The Project Site is within one-quarter mile of Francisco Bravo Medical Magnet Senior High School (0.2 mile east of the Project Site) and the East Los Angeles Occupational Center (0.1 mile southeast of the Project Site). Construction and demolition would involve activities with the potential to emit hazardous emissions or release hazardous building materials in proximity to these schools. **(Impact HAZ-5)** Operational hazardous materials use is routine, small	Potentially Significant (construction) Less Than Significant (operation)	Implement Mitigation Measures HAZ-1a through HAZ-1d.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
in scale, and subject to strict regulatory oversight, the potential for emissions or off-site releases affecting nearby schools is low.			
Significance Criterion d: Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment? The Project Site is included on hazardous materials regulatory lists with confirmed contamination and ongoing UST operations, the potential for exposure during construction is considered substantial. **(Impact HAZ-6)** Operational activities would not involve disturbance of known contamination or legacy fill	Potentially Significant (construction) Less Than Significant (operation)	Implement Mitigation Measures HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
soils. With appropriate mitigation and compliance with ongoing regulatory oversight, the potential for significant hazards during operation would be reduced to less than significant.			
Significance Criterion e: For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? The Proposed Project includes demolition of the existing emergency helipad and construction of a new helipad to support hospital emergency operations. Construction activities associated with this helipad would be limited to the Project Site and would not	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
introduce new flight operations or alter established flight paths during construction. Compliance with FAA standards would ensure that helipad demolition and reconstruction do not pose a hazard to air navigation or surrounding land uses. The Project Site is outside the influence area of any airport land use compatibility plan, and no private airstrips are located within two miles of the Project Site. Operation of the replacement helipad would continue to be regulated under FAA and LAFD requirements for emergency medical heliports, ensuring that flight operations, lighting, and airspace clearances remain consistent with applicable safety standards.			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion f: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Construction activities could temporarily impair and/or interfere with emergency response access in the vicinity of the Project Site because of possible temporary lane closures, detours, and construction-related traffic. This impact would be a temporary but is considered potentially significant impact. **(Impact HAZ-7)** The Proposed Project would be designed and operated to maintain sufficient emergency ingress and egress for fire and medical services, and no substantial impediments to	Potentially Significant (construction) Less Than Significant (operation)	Implement Mitigation Measures TRA-1 and TRA-4.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
emergency response or evacuation would occur.			
Significance Criterion g: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? The Project Site is not in a State of California Very High Fire Hazard Severity Zone (FHSZ) or in an area designated by the LACFD as subject to wildland fire risk.	No Impact (construction and operation)	None	No Impact (construction and operation)
HYDROLOGY AND WATER QUALITY			
Significance Criterion a: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Certain soils on the Project Site are contaminated and contain volatile organic compounds	Potentially Significant (construction and operation)	**Construction** Implement Mitigation Measure HAZ-2. **Operation** **Mitigation Measure HYD-2:** During the initial design of each future project, the Project Applicant(s) shall prepare project-specific Stormwater Mitigation Plans (SUSMP) for review and approval by the Los Angeles County Department of Public Works (LACDPW). Low-impact development (LID) features included in project-specific SUSMPs shall be designed to minimize the	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
(VOCs) in soil vapor above screening levels, petroleum hydrocarbons in shallow soils, and methane in mapped Methane Zones, all of which would be encountered during grading and excavation. **(Impact HYD-1).** There is potential that future implementing projects would result in leaching of nutrients from growing media, allowing phosphorus to enter the stormwater runoff. **(Impact HYD-2)**		leaching of nutrients from growing media. LID features shall avoid the use of growing media, mulch, and compost containing animal products, which may leach nutrients. Design modifications may include incorporation of an internal storage zone with an elevated underdrain and a carbon food source for denitrifying bacteria to create anaerobic conditions and subsequent denitrification. During the initial design of each future implementing project, the Project Applicant shall also prepare project-specific Operation and Maintenance (O&M) Plans for proposed LID features and on-site landscaping for review and approval by the Los Angeles County Department of Public Works (LACDPW). The O&M plans shall be revised as needed as development plans and proposed LID features are revised. The project specific O&M Plans shall consider impacts on water quality due to the leaching of phosphorous. O&M practices shall include integrated pest management and organic maintenance methods, including those for hand weeding. The use of fertilizers, pesticides, herbicides, and products containing animal manure or animal products shall be avoided. Prior to construction of future development projects on the Project Site, the Project Applicant(s) shall prepare and submit final building and landscape design plans to LACDPW demonstrating that all landscape-based LID features are designed	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		to improve water quality and minimize the leaching of nutrients from growing media.	
Significance Criterion b: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? Due to dewatering procedures for the Proposed Project, there is potential for the groundwater level to be impacted on the Project Site. Water use would increase during Project operation because of the increase in the number of persons who would use the Project Site and the increase in landscape maintenance. **(Impact HYD-3)**	Potentially Significant (construction and operation)	**Construction and Operation** **Mitigation Measure HYD-3a:** Prior to and during construction involving deep excavation that could encounter groundwater or dewatering, monitoring wells shall be installed by the Project Applicant(s) during construction within and around the perimeter of each structure to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey conducted by a licensed geotechnical or structural engineer retained by the Project Applicant(s) shall be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress shall be recorded. The baseline survey shall be submitted to the County and retained for reference during construction monitoring. **Mitigation Measure HYD-3b:** During project design, the Project Applicant(s) shall retain a qualified civil or water resources engineer to prepare a Recycled and Alternative Water Supply Feasibility Study evaluating the technical and economic feasibility of using non-potable water sources for landscape irrigation. The study shall identify feasible sources, projected supply volumes, system design concepts, and implementation costs. Based on the results of the feasibility study, future projects shall incorporate all technically and economically feasible non-potable supply systems into the final landscape irrigation supply.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Irrigation water demands greater than existing irrigation demands shall be met by alternative supply sources to the maximum extent technically feasible. The use of alternative water supply sources for irrigation shall be maximized to reduce the use of potable water for irrigation and to approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, reclaimed water, gray water, harvested rainwater (stormwater), and air-conditioning condensate (although not specifically mentioned in the master plan, this could represent a significant source of clean irrigation water). The County shall review and approve the Feasibility Study and irrigation design prior to permit issuance.	
Significance Criterion c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: i) Result in a substantial erosion or siltation on- or off-site? ii) Substantially increase the rate or amount of surface	Less Than Significant (construction) Potentially Significant (operation)	Implement Mitigation Measure HYD-2.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
runoff in a manner that would result in flooding on- or offsite? iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? iv) Impede or redirect flood flows? Adherence to the BMPs in SWPPPs and ESCPs would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Drainage would be designed such that the Proposed Project would not result in a substantial increase in the rate or amount of surface runoff or flooding on- or off-site. All potential future development disturbing more than one acre would be required to follow the SWPPP guidelines when designing on-			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
site stormwater treatment facilities. There is potential for erosion and siltation on the Project Site. Therefore, impacts are potentially significant. Adherence to regulatory requirements would minimize the amount of stormwater runoff from the Proposed Project. With the implementation of site-specific hydrology and hydraulic studies and adherence to LACDPW's allowable discharge rates, there would not be a significant increase in stormwater runoff to the County's storm drain system. Implementation of the Proposed Project would include a storm drain system to collect, treat, and convey stormwater into the existing storm drain system in the area. **(Impact HYD-4)**			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion d: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? The Project Site is not in a designated flood inundation area or tsunami inundation area. The Project Site is in an area with a minimal flood hazard.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion e: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? The Proposed Project could leach phosphorus into stormwater runoff, which would violate water quality standards. Therefore, without a set procedure in place, this impact would be potentially significant. **(Impact HYD-5)**	Less Than Significant (construction) Potentially Significant (operation)	Implement Mitigation Measure HYD-2.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
LAND USE AND PLANNING			
Significance Criterion a: Would the project physically divide an established community? All construction activities would be conducted in close partnership with existing County and hospital uses to ensure the Campus remains accessible to the larger region. The proposed uses and redevelopment at the Project Site would be limited to the existing boundaries of the Project Site. No surrounding residential neighborhoods would be divided, and no off-site residential buildings would be displaced due to the Proposed Project.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion b: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted	Less Than Significant (construction)	Implement Mitigation Measures CUL-1a through CUL-1c.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
for the purpose of avoiding or mitigating an environmental effect? The Proposed Project would be generally supportive of or consistent with the relevant policies and objectives in Connect SoCal 2024, LA County General Plan 2035, and the City's Northeast Los Angeles Community Plan. The Proposed Project has the potential to conflict with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect related to cultural resources. **(Impact LU-1).**	Potentially Significant (operation)		
NOISE			
Significance Criterion a: Would the project generate 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	Potentially Significant (construction and operation)	**Construction** **Mitigation Measure NOI-1: Reduce Construction Noise to the Extent Possible.** If construction activities associated with the Proposed Project have the potential to exceed the County's construction noise thresholds at nearby on- and off-site sensitive receptors, including during pile driving or other high noise	Significant and Unavoidable (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
plan or noise ordinance, or applicable standards of other agencies? The Proposed Project's construction-related pile driving activities would exceed applicable noise level standards. (**Impact NOI-1**) The Proposed Project has the potential to result in permanent noise increases in excess of applicable standards under operational conditions related to traffic. (**Impact NOI-2**) The Proposed Project has the potential to result in permanent noise increases in excess of applicable standards under operational conditions related to warehouse uses, clean tech/advanced industrial, mechanical equipment, and outdoor events. (**Impact NOI-3**)		construction activities, the Project Applicant(s) shall implement the following noise reduction measures during construction: ▪ To the extent feasible, construction activities shall occur between the hours of 7:00 am to 7:00 pm on Monday through Friday and 8:00 am to 6:00 pm on Saturdays, consistent with Section 12.08.520 of the County of Los Angeles Code of Ordinances. Construction activities shall not occur at any time on Sundays or legal holidays. Construction personnel shall not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours. If construction activities must occur outside of the allowable hours, the Project Applicant(s) shall follow necessary procedures to obtain an appropriate variance in accordance with Section 12.08.580 of the County of Los Angeles Code of Ordinances prior to conducting such activities. Construction activities occurring outside the allowable hours shall comply with all conditions of the approved variance. ▪ To the fullest extent practicable, the quietest available type of construction equipment shall be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment is typically quieter than diesel or gasoline powered equipment, and hydraulic powered equipment is typically quieter than pneumatic power.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Where feasible, impact pile driving shall be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles. ▪ All construction equipment shall be properly maintained. Poor maintenance of equipment typically causes excessive noise levels. ▪ All construction equipment, stationary and mobile, shall be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specification and are properly maintained and functioning during construction activities. Mobile or fixed "package" equipment (e.g., arc welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment. ▪ All noisy equipment shall be operated only when necessary, and should be switched off when not in use. ▪ The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. To the extent feasible, temporary barriers shall be employed around the project site and/or around noisy construction equipment, specifically pile driving equipment. For barriers to be effective they shall break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows:	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		o From commercially available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels should face the construction equipment). o From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material should face the construction equipment). o From acoustical blankets hung over or from a supporting frame. The blankets shall provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and shall be firmly secured to the framework with the sound absorptive side of the blankets oriented towards the construction equipment. The blankets shall be overlapped by at least 6" at seams and taped so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier. **Operation** **Mitigation Measure NOI-3a: Design Project Facilities to Ensure All Mechanical Equipment Complies with County Noise Standards.** During the architectural and engineering design phase of each new facility (building, central plant, parking structure,	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		etc.) that could introduce new mechanical equipment to the Project Site, and prior to the issuance of any building permits for the facility, the Project Applicant(s) shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Section 12.08.390 of the Los Angeles County Code of Ordinances to reduce impacts to off-site receptors. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers. **Mitigation Measure NOI-3b: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with County Noise Standards.** Prior to the issuance of any building permits for outdoor use areas that are anticipated to host organized events such as outdoor markets, farmers markets, summer concerts and health marches, etc. the Project Applicant(s) shall retain an acoustical consultant to evaluate the design (event layout, sound system design, etc.) and operational event details (crowd sizes, times of operation, etc.) to ensure that such events will comply with Section 12.08.390 of the Los Angeles County Code of Ordinances to reduce impacts to off-site receptors. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project generate excessive groundborne vibration or groundborne noise levels? The Proposed Project's construction-related pile driving activities would exceed applicable vibration standards. (**Impact NOI-4**) The Project Project's operational vibration levels are not anticipated to exceed applicable vibration standards.	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Measure NOI-4: Reduce Construction-Generated Groundborne Vibration to the Extent Possible**. The Project Applicant(s) shall implement the following vibration reduction measures during construction: ▪ Where possible, impact pile driving should be replaced with other piling techniques, such as vibratory pile driving or drilled and poured-in-place piles. ▪ Distance requirements for eligible or listed historical structures (as defined in Chapter 3.4, Cultural Resources of this Draft SEIR): o Pile driving shall not be operated within 135 feet, vibratory rollers within 36 feet, or other heavy equipment (e.g., bulldozer) within 20 feet. ▪ Distance requirements for non-engineered and masonry buildings: o Pile driving shall not be operated within 100 feet, vibratory rollers within 25 feet, or other heavy equipment (e.g., bulldozer) within 15 feet.	Significant and Unavoidable (construction) Less Than Significant (operation)
Significance Criterion c: For a project 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	No Impact (construction) Less Than Significant (operation)	None	No Impact (construction) Less Than Significant (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
people residing or working in the project area to excessive noise levels? The Project Site is not located within two miles of a public airport or public use airport. The existing helipads at the Project Site would continue to operate the long-term average noise levels generated by helicopters are anticipated to be relatively low compared to other existing noise sources and are not anticipated to change significantly as a result of the Proposed Project. Therefore, the noise impacts associated with helipads would be less than significant.			
POPULATION AND HOUSING			
Significance Criterion a: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
indirectly (for example, through extension of roads or other infrastructure)? The County and City have a large pool of construction labor from which to draw within commuting distance of the Project Site. Construction workers are likely to be employed on the job site only for as long as their skills are needed to complete a specific phase of the construction process. The increase in population anticipated on the Project Site represents a small percentage (approximately 2 percent) of the projected population growth for the City of Los Angeles.			
Significance Criterion b: Would the project displace substantial numbers of existing people or housing, necessitating the	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
construction of replacement housing elsewhere? There are no permanent housing units on-site; the Proposed Project would not displace existing housing.			
PUBLIC SERVICES			
Significance Criterion a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives? The Proposed Project's construction activities have the potential to result in temporary lane closures and could impair	Potentially Significant (construction) Less Than Significant (operation)	Implement Mitigation Measure TRA-1.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
or obstruct the movement of emergency vehicles **(Impact PS-1).** The proposed increase in demand on LAPD services associated with the Proposed Project's new residents and development would be minimal and would not require the construction of new or expanded police facilities. The Proposed Project would generate middle and high school students that would attend the local schools assigned to the Project Site. The Proposed Project would include open space, residential amenities, and community benefit space, which would provide recreational opportunities for residents and could reduce demand on off-site facilities.			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
RECREATION			
Significance Criterion a: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? It is unlikely that a substantial number of construction workers would relocate to the immediate vicinity of the Project Site such that use of existing parks or recreational facilities would result in substantial physical deterioration. Due to the provision of on-site facilities, it is not expected that the projected growth in resident, visitor, and employee populations on-site would result in a significant increase in the use of existing local parks.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion b: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? The Proposed Project includes additional open space and recreational areas. Construction activities could result in noise and air quality impacts on nearby sensitive receptors, including local residents, hospital patrons, or possibly users of local park and recreational facilities. **(Impact REC-1)** The Proposed Project's operation of open space areas could be used for organized outdoor events, which have the potential to result in impacts on ambient noise levels. **(Impact REC-2)**	Potentially Significant (construction and operation)	**Construction** Implement Mitigation Measures AIR-1a through AIR-1b and NOI-1 and NOI-4. **Operation** Implement Mitigation Measure NOI-3b.	Significant and Unavoidable (construction) Less Than Significant (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
TRANSPORTATION			
Significance Criterion a: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? The Proposed Project's construction activities have the potential to conflict with applicable program, plan, ordinance, or policies addressing the circulation system. (**Impact TRA-1**) The Proposed Project's operation would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant.	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Measure TRA-1:** The Project Applicant(s) shall develop and implement a Worksite Traffic Control Plan for any aspect of construction that would result in road closures, sidewalk closures, bicycle facility closures, removal of parking, or similar traffic disruptions. The Worksite Traffic Control Plan shall be prepared as part of the project design package according to California Manual on Uniform Traffic Control Devices (CA-MUTCD) requirements, and may include, but not be limited to, the following elements; ▪ Provide a roadway layout that shows the locations of construction activity and surrounding roadways to be used as detour routes, including special signage. ▪ Establish detour routes in coordination with the City of Los Angeles to minimize disturbances to local roadway conditions. ▪ Maintain access to existing residences at all times. ▪ Work with City of Los Angeles Department of Transportation, Los Angeles Sherriff's Department, Los Angeles County Fire Department, and Los Angeles Police Department, to coordinate all construction-related plans and minimize disturbances to local emergency management services (EMS) providers ensure that alternative evacuation and emergency routes are designed to maintain response times during construction. ▪ Provide adequate off-street parking areas at designated staging areas for construction-related vehicles.	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Work with transit provides to maintain access and circulation routes to existing stops during construction phases and identify appropriate detours to provide rerouting during construction while minimizing service disruptions. ▪ Work with the City of Los Angeles to maintain continuity and operations of existing pedestrian and bicycle facilities during construction.	
Significance Criterion b: Would the project conflict or be inconsistent with CEQA Guidelines Section15064.3, subdivision (b)? The Proposed Project would result in a reducing in vehicle miles traveled (VMT) compared to the exiting Countywide VMT. Impacts would be less than significant.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion c: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant (construction and operation)	Construction Implement Mitigation Measure TRA-1. Operation Prior to the start of construction for the first development phase of the Proposed Project, the Project Applicant(s) shall consult	Less Than Significant (construction) Significant and Unavoidable (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
The Proposed Project's construction activities have the potential to result in transportation hazards. Impacts would be potentially significant. (**Impact TRA-2**) The Proposed Project's operational traffic has the potential to result in transportation hazards related to queuing at off-ramps. (**Impact TRA-3**)		with County to develop timing mechanisms as to when the improvements identified in Mitigation Measure TRA-3(a)-(e) are implemented based on phased buildout of the Proposed Project. Mitigation Measure TRA-3a: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-5 southbound off-ramp to Mission Road. ▪ Re-stripe the off-ramp lane configuration from: o Left turn lane, shared through-left lane, and a right lane; to o two left turn lanes and one shared through-right turn lane. ▪ Optimize signal timing along the Mission Road coordinated corridor, including cycle length, offset, and phase splits. ▪ Apply the Caltrans' Intersection Safety Operational Assessment (ISOAP) methodology as appropriate to design and implement intersection improvements. Mitigation Measure TRA-3b: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-10 westbound off-ramp to State Street. ▪ Re-stripe the off-ramp lane configuration from: o Left turn lane, right turn lane; to o shared left-right turn lane and a right turn lane. ▪ Optimize signal timing along the State Street coordinated corridor, including cycle length, offset, and phase splits.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		▪ Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements. Mitigation Measure TRA-3c: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-10 westbound off-ramp to Soto Street. ▪ Re-stripe the off-ramp lane configuration from: o Left turn lane, shared through-left turn lane, and two right turn lanes; to o two left turn lanes, one through lane, and one right turn lane. ▪ Optimize signal timing along the Soto Street coordinated corridor, including cycle length, offset, and phase splits. ▪ Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements. Mitigation Measure TRA-3d: The following traffic operations improvements shall be implemented to mitigate potentially significant impacts to off-ramp queuing at the I-5 northbound off-ramp to Cesar Chavez Avenue. ▪ Optimize signal timing along the Soto Street coordinated corridor, including cycle length, offset, and phase splits. ▪ Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		Mitigation Measure TRA-3e: A comprehensive TDM program shall be implemented as part of the Proposed Project's mitigation program aimed at reducing vehicular trips to the Project Site, which may mitigate Project-induced freeway off-ramp queuing hazards. TDM strategies that the Proposed Project could implement to result in a quantitative reduction in vehicular trips include, but are not limited to, the following: ▪ Trip Reduction Strategies o Implement Commute Trip Reduction Program (Voluntary for Mandatory) o Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) o Implement Commute Trip Reduction Marketing o Provide Ridesharing Program o Implement Subsidized or Discounted Transit Program - All Trips o Provide End-of-Trip Bicycle Facilities o Provide Employer-Sponsored Vanpool ▪ Parking Strategies o Price workplace parking o Implement Employee Parking Cash-Out o Limit Residential Parking Supply o Unbundle Residential Parking Costs from Property Cost ▪ School	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		o Coordinate with Los Angeles Unified School District (LAUSD) to establish a School Bus Program o Active Modes of Transportation for Youth	
Significance Criterion d: Would the project result in inadequate emergency access? The Proposed Project would have the potential to interfere with emergency access to the Project Site during construction. Impacts would be potentially Significant. (**Impact TRA-4**) The Proposed Project would not result in inadequate emergency access under operational conditions. Impacts would be less than significant.	Potentially Significant (construction) Less Than Significant (operation)	Implement Mitigation Measure TRA-1.	Less Than Significant (construction and operation)
TRIBAL CULTURAL RESOURCES			
Significance Criterion a: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
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: 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)? No known tribal cultural resources listed or eligible for listing in the National Register, California Register, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) have been identified on the Project Site or in the immediate vicinity.			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion a: 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? Ground-disturbing activities have the potential to disturb native subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. **(Impact TCR-1)** Routine operations and maintenance activities are not expected to extend into native	Potentially Significant (construction) Less Than Significant (operation)	**Mitigation Measure TCR-1a: Native American Monitoring of Ground-Disturbing Activities in Native Soils** a) The Project Applicant(s) shall invite a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe) prior to the commencement of any ground-disturbing activities. "Ground-disturbing activities" shall include, but are not limited to, grading, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, for each implementing phase of the Proposed Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). b) The Project Applicant(s) shall make reasonable efforts to execute a Tribal Monitoring Agreement with the Native American Monitor prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence any ground-disturbing activity. c) The Native American Monitor shall work with the Project Applicant's qualified archaeologist during qualifying ground-disturbing activities to identify potential Native American Tribal Cultural Resources (TCRs) and communicate concerns regarding TCRs to the Project Applicant(s). The Native American Monitor will complete daily monitoring logs that will provide: description(s) and location(s) of the relevant ground-disturbing activity(ies), the type(s) of construction activity(ies), information and/or materials related to TCRs; and any other facts, conditions,	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
or previously undisturbed soils where tribal cultural resources could occur.		materials, or discoveries of significance to the Tribe. Daily monitoring logs will identify and describe any discovered TCRs. Copies of daily monitoring logs will be provided to the Project Applicant(s) and the County at the end of all Project-related ground-disturbing activities. Daily monitoring logs will be kept confidential with the Project records. d) On-site tribal monitoring shall conclude upon either of the following, whichever occurs first: (1) written notification to the Tribe from a designated point of contact for the Project Applicant(s) that all ground-disturbing activities and phases of Project implementation that may involve ground-disturbing activities are complete; or (2) written notification to the Project Applicant(s) from the Tribe that no future planned construction activity and/or development/construction phase of the Project has the potential to impact TCRs. **Mitigation Measure TCR-1b: Unanticipated Discovery of Tribal Cultural Resource (Non-Funerary)** a) In accordance with section 21074, subdivisions (a)(1)(A)-(B) of the Public Resources Code (PRC), a TCR is a site, feature, place, cultural landscape, sacred place or object, which is of cultural value to the Tribe and either: (1) on or eligible for the California Historic Register or other local historic register or (2) the County of Los Angeles, as the lead agency for the Project, at its discretion, chooses to treat the resource as a TCR. b) Upon discovery of any TCR or potential TCR, all construction activities within a radius deemed appropriate by the qualified	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		archaeologist shall cease and shall not resume until the discovered TCR has been fully assessed by the Native American Monitor and/or qualified archaeologist. If the assessment finds the resource to be a TCR, treatment measures and final disposition will be determined in consultation with the Tribe. **Mitigation Measure TCR-1c: Unanticipated Discovery of Native American Human Remains and/or Associated Grave Goods** a) Native American human remains are defined in section 5097.98, subdivision (d)(1) of the PRC as an inhumation or cremation in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in section 5097.98 of the PRC, shall be treated alike per section 5097.98, subdivisions (d)(1) and (2) of the PRC. b) If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then section 5097.9 of the PRC as well as Health and Safety Code Section 7050.5 shall be followed. c) Any discovery of Native American human remains and/or grave goods shall be kept confidential to prevent further disturbance.	
UTILITIES AND SERVICE SYSTEMS			
Significance Criterion a: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? The water system for future development within the Project Site would be designed to provide on-site water demands from the existing public water collection system owned by LADWP. Once operational, the sewer system would be designed to convey on-site sewage flows within the Project Site to the existing public sewer collection system owned by LASAN, which ultimately discharges into the Hyperion Water Reclamation Plant. The Proposed Project would be required to comply with site-specific "allowable discharge rates" that limit post-project peak flow discharges compared to existing conditions, thus			

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
minimizing the potential for flooding on- or off-site. With the Central Utility Plant, the Proposed Project's electrical demand on the grid would not result in the need for new or expanded LADWP facilities. New and replacement buildings in compliance with these standards would generally have greater natural gas efficiency than existing buildings. The Project Site is currently served by telecommunication infrastructure, and increased service connections as part of the Proposed Project would be done incrementality.			
Significance Criterion b: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant (construction) Potentially Significant (operation)	**Mitigation Measure USS-1:** As part of the site plan review for any future individual development project under the Proposed Project that is considered for construction and operation in 2045 or later, and that is also defined as a "water-demand project" in Section 15155 of the State CEQA Guidelines, the County shall request, pursuant to Section 15155, that the water provider, the City of Los Angeles Department of Water and Power (LADWP), determine whether the projected water demand associated with these project(s) was included in the most recently adopted urban	Less Than Significant (construction) Significant and Unavoidable (operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
The Proposed Project assumes a phased long-term 25-year development horizon. The current 2020 UWMP projects water supplies based on population projections through 2045. The next UWMP will project water supplies through 2050. As such, it is not known whether sufficient water supplies and entitlements would exist to accommodate those projects' water demand. Therefore, water supply impacts for projects constructed after 2045 could be potentially significant. **(Impact USS-1).**		water management plan. If required pursuant to Section 15155, the County shall request that LADWP prepare water supply assessment(s) for these future projects. The County shall determine, pursuant to Section 15155, whether projected water supplies would be sufficient to satisfy the demands of the future project(s), in addition to existing and planned future uses within LADPW's service area.	
Significance Criterion c: Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition	Potentially Significant (construction and operation)	**Construction and Operation** **Mitigation Measure USS-2:** Prior to issuance of a building permit for any future development under the Proposed Project that could result in an increase in wastewater generation, the Project Applicant(s) shall coordinate with the City of Los Angeles Bureau of Sanitation to conduct further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. If the public sewer has insufficient capacity, then the	Significant and Unavoidable (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
to the provider's existing commitments? Based on the estimated flows, the sewer conveyance system would be appropriately sized to accommodate the total flow for the Proposed Project; however, further detail gauging and evaluation may be needed as part of the permit process for individual projects to identify suitable sewer connection points and ensure adequate line capacity. A final approval for sewer capacity and connection permit shall be made at that time. If there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered to be significant. Therefore, impacts would be potentially significant. **(Impact USS-2)**		County shall be required to build a sewer line to a point in the sewer system with sufficient capacity.	

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Significance Criterion d: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? The Proposed Project would divert 50 percent of all generated tonnage for recycling and reuse, pursuant to the County of Los Angeles Code of Ordinances Chapter 20.87. In addition, CALGreen requires a minimum of 65 percent of the nonhazardous construction and demolition waste to be recycled and/or salvaged. The Proposed Project's landfill waste would be less than one percent of the residual capacities for the Simi Valley Landfill & Recycling Center, the Antelope Valley Public Landfill,	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
and the Lancaster Landfill and Recycling Center. Therefore, there is sufficient capacity at the landfills for solid waste generated by the Proposed Project.			
Significance Criterion e: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? The Proposed Project's solid waste is adequately accommodated by landfills serving the Project Site. The County and landfills that would serve the Project Site would comply with all applicable federal, State, and local solid waste regulations, such as Division 4.4 of the CALGreen Code, AB 341, AB 1826, and the Los Angeles County Code of Ordinances Chapter 20.87.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
WILDFIRE			
Significance Criterion a: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? Compliance with local and State requirements and regulations would ensure that development of the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
Significance Criterion b: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? Development of the Proposed Project would occur on a site	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
that is already developed and not in a very high FHSZ. Adherence to building practices, fire safety regulations, and vegetation fuel management requirements would reduce the potential for exacerbating wildfire risks.			
Significance Criterion c: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environments? The installation of new utilities would be regulated under the CBC and CFC and is subject to fire safety review and oversight by the LAFD, which would minimize wildfire risks associated with the installation	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Table ES-2 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
and maintenance of infrastructure.			
Significance Criterion d: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? The Project Site is fully developed and is not in proximity to steep slopes or natural drainage courses, and is not located in a VHFHSZ. Therefore, impacts would be less than significant.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

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1. INTRODUCTION

This document is a Draft Subsequent Environmental Impact Report (SEIR) to the Los Angeles County + University of Southern California (LAC+USC) Medical Center Campus Master Plan EIR (2014 Master Plan EIR, State Clearinghouse No. 2014051061) that was certified on November 18, 2014, by the Los Angeles County Board of Supervisors (Board) as the governing body of the County of Los Angeles (County). This Draft SEIR evaluates the proposed Los Angeles County General Hospital Campus Master Plan (LA County General Hospital Campus Master Plan or Proposed Project). The Proposed Project includes implementation of the Proposed Project. The LA County General Hospital Campus Master Plan would guide future redevelopment of a portion of the County-owned property in and around the Los Angeles General Medical Center (herein referred to as the Project Site or Campus). This Draft SEIR has been prepared in accordance with Section 21166 of the Public Resources Code and State California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15164. The County of Los Angeles is the lead agency under CEQA, acting through the Department of Economic Opportunity (DEO)

1.1 BACKGROUND

The LAC+USC Medical Center (Campus or Project Site) was established in 1878, with the approximately 1.2 million square foot General Hospital Building opening in 1933. As one of the largest hospitals in the country, the Campus has continued to play an active role in the provision of health services of the County since the late-1800s. In response to evolving building and safety code requirements, the County initiated plans in 1998 to replace the historic General Hospital. A new modern facility (Los Angeles General Medical Center [Medical Center]) was completed in 2008 and now serves as the primary medical hub of the Campus. The General Hospital building has remained largely vacant, with the exception of the Wellness Center, located on the ground level, and Los Angeles County Departments of Public Works and Health Services operation and maintenance staff, located in ground and subterranean levels since 2008.

The Board approved the LAC+USC Medical Center Campus Master Plan (2014 Master Plan), certified the 2014 Master Plan EIR, and adopted a Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program (MMRP) on November 18, 2014. It should be noted that the name of the Campus has since changed to the Los Angeles General Medical Center (Medical Center). The Board approved the name change during their meeting on Tuesday, May 2, 2023.

The 2014 Master Plan EIR analyzed the environmental impacts associated with buildout of the 2014 Master Plan, which included the construction of new and renovated medically related

office, retail, open space, and parking uses and demolition of existing buildings and structures on the Campus to accommodate new development over a 25-year period. The main elements of the 2014 Master Plan included the following:

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

The objectives of the 2014 Master Plan, as identified in the 2014 Master Plan EIR, were to:

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

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

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

Since certification of the 2014 Master Plan EIR, three addenda have been prepared to analyze refinements to the 2014 Master Plan and were certified by the County in 2017, 2023, and 2025. Additionally, an exemption was processed in 2024 for a permanent supportive housing facility on the Project Site. Under the 2014 Master Plan, including the subsequent addenda, full buildout could result in a total of approximately 1,227,412 square feet of development throughout the Project Site. References to the “2014 Master Plan EIR” in this Draft SEIR include

the 2014 Master Plan EIR, the three certified addenda, and exemption unless otherwise noted. Similarly, references in this Draft SEIR to the 2014 Master Plan include the 2014 Master Plan and any amendments, as evaluated by the subsequent addenda, unless otherwise noted. A description of the refinements evaluated under each addendum is provided below.

Restorative Care Village Phase I

The Restorative Care Village (RCV) Phase I and III Project (2017 Project) proposed three new facilities that were not proposed in the 2014 Master Plan Project or analyzed in the 2014 Master Plan EIR: 1) a 96-bed recuperative care facility, 2) a 64-bed crisis residential treatment program facility, and 3) a replacement childcare facility. The 2017 Project included two other changes to the 2014 Master Plan: 1) relocation of the proposed new central utility plant from a site south of Zonal Avenue to a site just to the southwest, and 2) a 20 percent reduction (127,000 square feet) in the 635,000 square feet of Research and Development use that was projected under the 2014 Master Plan. The Board certified the addendum for the 2017 Project on December 19, 2017. The RCV Phase I component (a total of 70,342 square feet) was competed in April 2022, and the relocation of the childcare facility was completed in January 2023.

Restorative Care Village Phase II

According to the certified addendum to 2014 Master Plan EIR for the RCV Phases IV and V Project, Phase II of the RCV consists of interior renovations to existing wards inside the main hospital tower. At the time this Draft SEIR was prepared, construction related to interior renovations to existing wards inside the main hospital tower has not yet begun.

Restorative Care Village Phase III

The RCV Phase III Project (2024 Project) proposed the development of a new permanent supportive housing building and wellness hub. The 2024 Project consisted of 294 units for low-income seniors and people experiencing homelessness and two manager's units. The 2024 Project was determined to be exempt from CEQA under Public Resources Code Section 21080.27 (Statutory Exemption). At the time this Draft SEIR was prepared, the 2024 Project was under construction.

Restorative Care Village Phases IV and V

The RCV Phases IV and V Project (2023 Project) proposed three new components on the Project Site: 1) a two-story, 33,650-square-foot mental health urgent care center and residential withdrawal management facility; 2) a four-story, 115,420-square-foot and 128-bed psychiatric subacute facility; and 3) surface parking lot with 55 spaces around the new buildings. The 2023

Project also included a reduction of 60,000 square feet of Research and Development use and a reduction of 50,000 square feet of Professional/Administrative Office use. The Board certified the 2023 Addendum December 19, 2023. At the time this Draft SEIR was prepared, construction of RCV Phases IV and V was ongoing.

Los Angeles County General Hospital & West Campus Stabilization Project

The Los Angeles County General Hospital & West Campus Stabilization Project (2025 Project) included four stabilization components. Three of the components were within the scope of the 2014 Master Plan EIR: 1) demolition of select structures on the West Campus; 2) modifications to site infrastructure, accessibility, and hazards on the West Campus; and 3) decommissioning and demolition of the West Central Plant. In addition, the 2025 Project proposed two components not evaluated in the 2014 Master Plan EIR: 1) the maintenance and seismic retrofit of the General Hospital to address its immediate structural integrity needs; and 2) the relocation of operations of the Violence Intervention Program–Community Mental Health Clinic from portions of the Project Site to the Central Juvenile Hall campus at 1605 Eastlake Avenue. The Board certified the 2025 Addendum on June 17, 2025. At the time this Draft SEIR was prepared, construction of the 2025 Project has not yet begun.

The General Hospital Stabilization component of the 2025 Project is intended to address ongoing structural safety, maintenance, and preservation needs associated with the aging historic building. These stabilization activities were approved and were necessary to reduce seismic risk and maintain the structural integrity of the buildings.

Los Angeles General Hospital Campus Master Plan (Proposed Project)

This Draft SEIR analyzes the impacts of the proposed LA County General Hospital Campus Master Plan (Proposed Project). In 2023, the County issued a request for proposals (RFP), seeking a partner in a public-private partnership to catalyze the redevelopment of the Campus with the goal of creating a mixed-use neighborhood. The County has partnered with Centennial Partners to lead the master planning effort. The Master Plan would guide future redevelopment on parts of the Campus and is the subject of this SEIR. The Proposed Project analyzed in this Draft SEIR would allow for redevelopment at the Project Site with a mixed-use community within Project Site that is interconnected with the Los Angeles General Medical Center (Medical Center), RCV, and the surrounding community. A full description of the Proposed Project is provided in Chapter 2, *Project Description*, of this Draft SEIR.

1.2 PURPOSE OF THIS SUBSEQUENT EIR

As previously stated, the Board approved the 2014 Master Plan and certified the 2014 Master Plan EIR on November 18, 2014. The 2014 Master Plan EIR evaluated the environmental effects associated with implementation of the 2014 Master Plan and identified mitigation measures to avoid or substantially lessen significant impacts where feasible, specific to the master plan envisioned at that time. This Draft SEIR relies on and incorporates by reference the analysis, findings, and conclusions of the 2014 Master Plan EIR, subsequent addenda, and exemption (collectively referred to as "2014 Master Plan EIR") to the extent that the prior analysis remains relevant and applicable. The Proposed Project under consideration and evaluated in this Draft SEIR represents a new proposed Master Plan that would govern redevelopment on parts of the Project Site, and would largely supersede the prior Master Plan that was approved by the County. The Proposed Project represents a substantial change from the project considered in the 2014 Master Plan EIR and related County approvals.

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft SEIR evaluates the environmental impacts of the Proposed Project in comparison to conditions existing at the time the Notice of Preparation (NOP) was circulated and determines whether the previous environmental documentation retains adequate informational value on the assessment of environmental impacts, or whether the Proposed Project would result in new or substantially different significant environmental impacts such that previously proposed mitigation measures would be eliminated or revised, or whether new mitigation measures are required. Refer to Chapter 3, *Environmental Analysis*, of this Draft SEIR for a detailed description of the existing conditions of the Project Site.

This Draft SEIR has been prepared in accordance with State CEQA Guidelines Section 15162, Subsequent EIRs and Negative Declarations. State CEQA Guidelines Section 15162(a) and 15162(b) state that:

- When an EIR has been certified or a negative declaration adopted for a project, no SEIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - 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;
  - 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

- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

- If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Pursuant to Section 15162 of the State CEQA Guidelines, this Draft SEIR has been prepared to evaluate the environmental effects of the Proposed Project, which represents a new discretionary action and would result in a new Master Plan that would largely replace the previously approved 2014 Master Plan Project analyzed in the 2014 Master Plan EIR. This Draft SEIR relies on and incorporates by reference the analysis, findings, and conclusions of the 2014 Master Plan EIR, subsequent addenda, and exemption (collectively referred to as "2014 Master Plan EIR") to the extent that the prior analysis remains relevant and applicable. The 2014 Master Plan EIR continues to provide the foundation for the environmental review of the Proposed Project and the analysis contained in this Draft SEIR builds upon that prior work rather than repeating it in its entirety.

This is a program Draft SEIR that evaluates the environmental impacts associated with the full buildout of development under the proposed Master Plan through a 25-year (2050) planning horizon. The Draft SEIR recommends mitigation measures that are intended to mitigate the identified significant impacts associated with the buildout under the Master Plan. Some previously adopted mitigation measures from the 2014 Master Plan EIR are carried forward as part of the Proposed Project, to the extent they remain applicable and effective at reducing environmental impacts. In some cases, modifications to previously adopted measures are proposed to reflect current site conditions, specifics of the Proposed Project, or updated

regulatory requirements. Some previously adopted mitigation measures may no longer applicable, or the need for new mitigation measures is identified. Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, to this Draft SEIR, details the proposed mitigation measures associated with the Proposed Project, and documents those changes from the 2014 Master Plan EIR.

This Draft SEIR has also been prepared in accordance with the County of Los Angeles Environmental Document Reporting Procedures and Guidelines (County Guidelines), adopted by the County in November 1987. This evaluation is consistent with County Guidelines Section 705, Tiering, which states that agencies are encouraged to tier EIRs to eliminate repetition and focus the discussion at each level of environmental review. As the level of detail increases, the EIR should be limited to the effects not discussed previously. Each report should just focus on the impacts that are new or more specific to the level of planning analyzed.

The overall purpose of this Draft SEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the probable environmental effects resulting from construction and operation of the Proposed Project. Discretionary actions currently foreseeable by the County, as lead agency, are described in Section 2.6, *Intended Uses of the EIR*. This Draft SEIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

This Draft SEIR for the Proposed Project is a programmatic SEIR. A program EIR is described in Section 15168 of the State CEQA Guidelines as an EIR that "may be prepared on a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, [or] in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program…." Because the Proposed Project consists of a proposed master plan that sets a framework for redevelopment of parts of the Campus over a period of years (estimated 25 years for the purposes of this SEIR), the County determined that a program SEIR would be the appropriate document for the Proposed Project.

As a program-level SEIR, this Draft SEIR evaluates a reasonable and likely maximum development, which was assumed for the environmental analysis, that could be developed based on the level of information that is currently available. Later activities would also be required to adhere to applicable regulations, standards, and mitigation measures identified as part of this Draft SEIR.

By completing programmatic environmental review of the full buildout, future projects may proceed with streamlined entitlement processes and subsequent environmental review pursuant to CEQA. Such tiering under CEQA is intended to eliminate some otherwise the repetitive evaluation of the same environmental issues that were adequately addressed in the first-tier environmental impact report. Review of proposed future projects under the proposed

Master Plan would comply with State CEQA Guidelines Section 15168 and other applicable provisions of CEQA.

1.3 ENVIRONMENTAL REVIEW PROCESS

1.3.1 Notice of Preparation and Scoping Period

The NOP process facilitates early agency coordination and can assist with determining the scope of the environmental issues to be addressed in the Draft SEIR. State CEQA Guidelines Section 15063 states that, if the lead agency can determine that an EIR will clearly be required for a project, an Initial Study is not required. Given the substantial amount of previous information regarding anticipated potential environmental impacts disclosed in the 2014 Master Plan EIR, the County determined that preparation of an Initial Study was not necessary, in accordance with State CEQA Guidelines Section 15063, to anticipate the scope environmental issues that would arise from the Proposed Project.

The County determined that an SEIR would be appropriate for this project based on the discussion provided above and issued a "Notice of Preparation (NOP) of a SEIR and Notice of Public Scoping Meeting" on September 25, 2025, for a 30-day comment period to conclude on October 27, 2025 (see Appendix A, *NOP and Scoping Comments Received*). As a result of public comments received during the scoping period, the County elected to extend the comment period through November 21, 2025. Comments received during the NOP's public review period, from September 26, 2025, to November 21, 2025, are in Appendix A. A public scoping meeting was noticed and held virtually via Zoom Conferencing on October 8, 2025, at 5:00 p.m. Written comments and verbal comments transcribed by a court reporter are also included in Appendix A.

Table 1-1, *Summary of Scoping Comments Received*, identifies the comments received during the NOP public review period and the comments received during the scoping meeting. Comments were reviewed and considered, and where appropriate, the Draft SEIR addresses these comments by incorporating additional analysis, clarifying project impacts, and refining mitigation measures.

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
Kristie Hernandez	10/08/25	▪ Questions about the Proposed Project's process for community outreach ▪ Raises concerns regarding plumbing, electrical, and water	Chapter 1, *Introduction*, Chapter 3.3, *Air Quality*, Chapter 3.15, *Transportation*, and

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
		infrastructure, traffic, parking, emergency vehicle access, and air quality	Chapter 3.17, *Utilities and Service Systems*
Cassidy Bennett	10/08/25	▪ Questions how the community benefits agreement will be enforced	Chapter 2, *Project Description*
Pamela Eastside	10/08/25	▪ Requests that the scoping period is extended ▪ Expresses concern about relevance of impacts discussed in the 2014 Master Plan EIR	Chapter 1*, Introduction* and Chapter 3, *Environmental Analysis* *Comment period was extended from October 27 to November 21, 2025*
Jesus Estrada-Martinez	10/08/25	▪ Expresses concern that community benefits will be limited ▪ Questions if the Master Plan can maximize potential community benefits ▪ Questions if the community is able to suggest other categories for evaluation beyond those included in the CEQA checklist	Chapter 2, *Project Description* and Chapter 3, *Environmental Analysis*
Ari Gutierrez Arambula	10/08/25	▪ Questions if the SEIR will evaluate the underground of the Campus ▪ Questions if there will be consideration of air traffic, drones, helipads, etc. ▪ Questions if there will be revenue generating activities on the Campus that can help fund the community	Chapter 2, *Project Description*, Chapter 3.6, *Geology and Soils*, and Chapter 3.15, *Transportation*
Daniel Jimenez	10/08/25	▪ No comments provided	N/A
Yolanda Durate	10/08/25	▪ Questions if there will be an opportunity to review the major revisions to the 2014 Master Plan EIR ▪ Questions if the mitigation measures identified in the 2014 Master Plan EIR have been revised	Chapter 2, *Project Description* and Chapters 3.1 through 3.18 Appendix B

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
		▪ Questions the extent to which the Proposed Project would impact the community benefits agreement	
Emmanuel Matamoros	10/08/25	▪ States that the University of Southern California (USC) should share some of community agreements and benefits responsibilities	Chapter 2, *Project Description*
Vivian English	10/08/25	▪ No comments provided	N/A
Alicia Godinez Rodriguez	10/08/25	▪ States that the community needs affordable housing, increased housing rates, a limit on the demolition of rent-stabilized housing, and commitment to providing benefits for the community	Chapter 2, *Project Description* and Chapter 3.12, *Population and Housing*
Andrew Leung	10/08/25	▪ Proposes that the General Hospital's 2nd floor medical library space be preserved and operation of the library be provided by the LAC Public Library System	Chapter 2, *Project Description*
Native American Heritage Commission (NAHC)	10/13/25	▪ Recommends consultation with California Native American tribes ▪ Provides a summary of AB 52, SB 18, and NAHC recommendations for conducting cultural resource assessments	Chapter 3.16, *Tribal Cultural Resources*
Benjamin Franklin Library	10/17/25	▪ States that the Benjamin Franklin Branch Library is temporarily closed and cannot be used as a location to post the NOP or SEIR	Notice of Availability (NOA) *Location removed from distribution list*
Los Angeles County Fire Department (LACFD)	10/17/25	▪ Requests that the NOP comment period be extended. ▪ Issues are not foreseen with the Project	Chapter 1*, Introduction* *Comment period was extended from October 27 to November 21, 2025*

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
Los Angeles Metro	10/21/25	▪ Requests that the Draft SEIR include a discussion regarding Bus Service ▪ Provides recommendations for transit-oriented development ▪ Provides a link to Metro Adjacent Development Handbook	Chapter 3.15, *Transportation*
Southern California Association of Governments (SCAG)	10/23/25	▪ Requests that the Draft SEIR include a side-by-side comparison of the SCAG goals with discussions of the consistency, non-consistency, or non-applicability of the goals and supportive analysis; provides a suggested format ▪ Recommends that the Proposed Project's CEQA lead agency review the Connect SoCal 2024 PEIR for guidance on mitigation measures	Chapter 3.7, *Greenhouse Gas Emission*, Chapter 3.11, *Land Use and Planning*, and Chapter 3.15, *Transportation*
California Department of Transportation (Caltrans)	10/23/25	▪ Suggests the Proposed Project incorporate multi-modal and complete streets transportation elements ▪ Identifies intersections that may be impacted by the proposed project ▪ Requests that the County provide Caltrans with the opportunity to review the traffic safety impact analysis ▪ Recommends that pedestrian and bicycle connectivity be clearly incorporated into the project description ▪ Suggests a multimodal conflict analysis be conducted ▪ Suggests that the Draft SEIR ensure all modes are served well by planning and development activities including reducing single occupancy vehicle trips, ensuring	Chapter 2*, Project Description,* Chapter 3.7, *Greenhouse Gas Emissions*, and Chapter 3.15, *Transportation*

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
		safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions	
City of Los Angeles Department of Transportation (LADOT)	10/26/25	▪ Requests that the County provide the City with the opportunity to review the transportation study for the Proposed Project ▪ States that the transportation study for the Proposed Project should be prepared following the latest Transportation Assessment Guidelines August 2022	Chapter 3.15, *Transportation*
Los Angeles County Sheriff's Department (LASD)	10/28/25	▪ LASD expects that the Draft SEIR will evaluate the Proposed Project's impacts on public services, population, transportation, and noise ▪ LASD expects the SEIR to include a Construction Traffic Mitigation Plan	Chapter 3.11, *Noise*, 3.12, *Population and Housing*, Chapter 3.13, *Public Services*, and Chapter 3.15, *Transportation*
Law Office of Jordan R. Sisson on behalf of SEIU Local 721	10/28/25	▪ Requests that the NOP be recirculated and requests that an IS be circulated with the recirculated NOP ▪ States that none of the previous environmental documentation is readily available on the County's website for the Proposed Project ▪ States that the NOP needs to clarify the scope of the Program EIR and future CEQA review ▪ Provides recommendations for the inclusion of a statement of overriding considerations and alternatives to be included in the NOP to allow the public to provide comments	Chapter 1, *Introduction* and Chapter 4, *Alternatives to the Proposed Project*

Table 1-1 Summary of Scoping Comments Received

Commenting Agency/Person	Date	Comment Summary	Issue Addressed In:
Los Angeles Unified School District (LAUSD)	10/28/25	▪ Identifies one District site and one school located in the Project's study area ▪ Recommends measures and conditions designed to help reduce or eliminate potential impacts to schools ▪ Requests the EIR specifically addresses potential impacts to schools regarding Air Quality, Hazards, Noise, and Transportation/Traffic (including pedestrian safety) ▪ States that the Team must coordinate any construction activities with LAUSD	Chapter 3.3, *Air Quality*, Chapter 3.8, *Hazards and Hazardous Materials*, Chapter 3.11, *Noise*, Chapter 3.13, *Public Services*, and Chapter 3.15, *Transportation*
Los Angeles County Fire Department (LACFD)	11/7/25	▪ States that the Project Site is within the City of Los Angeles, which is not part of the emergency response area for LACFD ▪ Determined that the Proposed Project would not have any impact on the emergency responsibilities of LACFD ▪ States that specific fire and life safety requirements will be determined upon submittal of design or architectural plans to the LACFD as part of the building plan check review process prior to building permit issuance	Chapter 3.13, *Public Services*

1.3.2 Draft Subsequent EIR Public Review and Comment Period

The scope of the Draft SEIR was determined based on the comments received by the County in response to the NOP as well as the County's understanding of environmental resources and issues present on the Project Site through its preparation the 2014 Master Plan EIR. Pursuant to Sections 15126.2 and 15126.4 of the State CEQA Guidelines, the Draft SEIR should identify any

potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance. The information in Chapter 2, *Project Description*, establishes the basis for analyzing project-related environmental impacts.

This Draft SEIR is being circulated for public review for 45 days, from May 15, 2026, to June 29, 2026. Interested agencies, members of the public and other entities are invited to provide written comments on the Draft SEIR to the County address shown below. Upon completion of the 45-day review period, the County will review all written comments received and prepare written responses for comments that raise environmental issues pursuant to Public Resources Code section 21091(d).

The Draft SEIR is available to the general public for review at the following location: https://opportunity.lacounty.gov/how-we-help/capital-development-projects/

Comments from agencies, individuals, and others on the Draft SEIR must be submitted prior to the close of the 45-day public review period which ends on June 29, 2025, at 5:00 pm. All comments on the Draft SEIR should be sent to:

Krystin Hence, Assistant Director, Capital Development
County of Los Angeles
Department of Economic Opportunity
510 S. Vermont Avenue, 11th Floor
Los Angeles, CA 90020
Tel: (844) 777-2059
generalhospital@opportunity.lacounty.gov

The County will also host an informational public meeting during the 45-day public comment period for the Draft SEIR. The meeting will be held virtually (via Zoom) on Thursday, June 11, 2026 from 5:00 pm to 6:30 pm, and will include a presentation overview of the results of this Draft SEIR and provide an opportunity to receive verbal comments from the public.

Public agencies that submit comments during the 45-day public review period on the SEIR will receive written responses to their comments at least 10 days prior to final action on the Proposed Project. If the Board decides to certify the Final SEIR, it will make any necessary findings required by CEQA and the State CEQA Guidelines regarding the extent and nature of the impacts presented in the Final SEIR. The Final SEIR must be certified by the County Board of Supervisors on behalf of the County prior to a decision to approve the Proposed Project.

1.3.3 Preparation of the Final Subsequent EIR and Consideration of Project

Following completion of the 45-day Draft SEIR public review period, a Final SEIR will be prepared. A Final SEIR will incorporate the received comments, responses to the comments, and any changes to the Draft SEIR that result from comments. The Final SEIR will be presented to the County for certification as the environmental document for the project. Public agencies, members of the public and others who comment on the Draft SEIR will be notified of the availability of the Final SEIR and the date of the public hearing before the County.

If the decision-making body of the lead agency (here, the Board) approves the Proposed Project, CEQA requires the Board adopt "findings" with respect to each significant effect identified in the EIR (Public Resources Code Section 21081; State CEQA Guidelines Section 15091). For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- Changes or alterations have been required for, or incorporated into, the project that avoid or substantially lessen the significant environmental effect, as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In the event that the County, as the lead agency, concludes that the Proposed Project will result in significant effects that would not be substantially lessened or avoided by feasible mitigation measures and alternatives, the County must adopt a "statement of overriding considerations" (Public Resources Code Section 21081, subd. (b); State CEQA Guidelines Section 15093). Under CEQA, such statements are intended to provide a written means by which the lead agency balances the benefits of the Proposed Project with the identified significant and unavoidable environmental impacts.

Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts, the lead agency may find such impacts "acceptable" and approve the project. In addition, pursuant to Section 21081.6 of the Public Resources Code, public agencies, when approving a project, must also adopt a program for monitoring or reporting the changes that were incorporated into the project or made a condition of project approval to mitigate or avoid significant effects on the environment.

As part of the certification of the 2014 Master Plan EIR, the Board adopted a Mitigation Monitoring and Reporting Program (MMRP) in compliance with 21081.6 of the California Public

Resources Code. The MMRP identified the mitigation measures adopted by the Board to avoid or substantially lessen the significant environmental effects of the 2014 Master Plan and established the procedures for monitoring, reporting, and verifying implementation of those measures. Should the County elect to certify the Draft SEIR, a new MMRP reflecting the updated measures identified in this Draft SEIR will be prepared and adopted by the County. The revised MMRP will supersede the previously adopted MMRP for purposes of monitoring and ensuring implementation of all applicable mitigation measures for the Proposed Project.

1.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft SEIR, consistent with section 15150 of the State CEQA Guidelines, and they are available for review at the County of Los Angeles Department of Economic Opportunity Website at the following location: https://opportunity.lacounty.gov/generalhospital/

- *LAC+USC Medical Center Master Plan EIR*, County of Los Angeles, November 2014.
- *Recuperative Care and Crisis Residential Care Centers*, County of Los Angeles, November 2017.
- *Psychiatric Subacute Facility, Mental Health Urgent Care Center, Residential Withdrawal Management Facility*, County of Los Angeles, October 2023.
- *LA County General Hospital & West Campus Stabilization Project*, County of Los Angeles, June 2025.
- *LA County General Hospital Campus Master Plan*, Centennial Partners, May 2026.

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter of the Draft Subsequent Environmental Impact Report (SEIR) describes the proposed Los Angeles (LA) County General Hospital Campus Master Plan Project (Proposed Project). The lead agency pursuant to Section 15050 of the State California Environmental Quality Act (CEQA) Guidelines is the County of Los Angeles (County). The Department of Economic Opportunity (DEO) is carrying out the SEIR process on behalf of the County. The County of Los Angeles Board of Supervisors, as governing body of the County, would consider the Draft SEIR when the Proposed Project is recommended to the Board for approval. The Proposed Project includes implementation of the Los Angeles County General Hospital Campus Master Plan (proposed Master Plan), which would guide future redevelopment of parts of the County-owned Los Angeles General Medical Center Campus (Campus). This chapter describes the Proposed Project objectives, components, and construction assumptions that are used as the basis for the environmental impacts evaluation in this Draft SEIR. Existing land uses and site conditions that form the environmental baseline are described in Chapter 3, *Environmental Analysis*.

2.2 PROJECT LOCATION

The Project Site (also referred to as Campus in this Draft SEIR) is on County-owned property in the City of Los Angeles, immediately northeast of Interstate (I-) 5 (Golden State Freeway) and north of I-10 (San Bernardino Freeway). The Project Site is recognized as a regionally significant medical facility, central to the provision of health and community services across the County of Los Angeles. Figure 2-1, *Regional Location*, depicts the regional location of the Proposed Project. The Campus is surrounded by the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles to the south and north, respectively. The Project Site is accessible via I-5 and I-10 as well as proximate regional transit connections, including Los Angeles Union Station approximately two miles from the Project Site, further reinforcing its role as a regional hub for medical services.

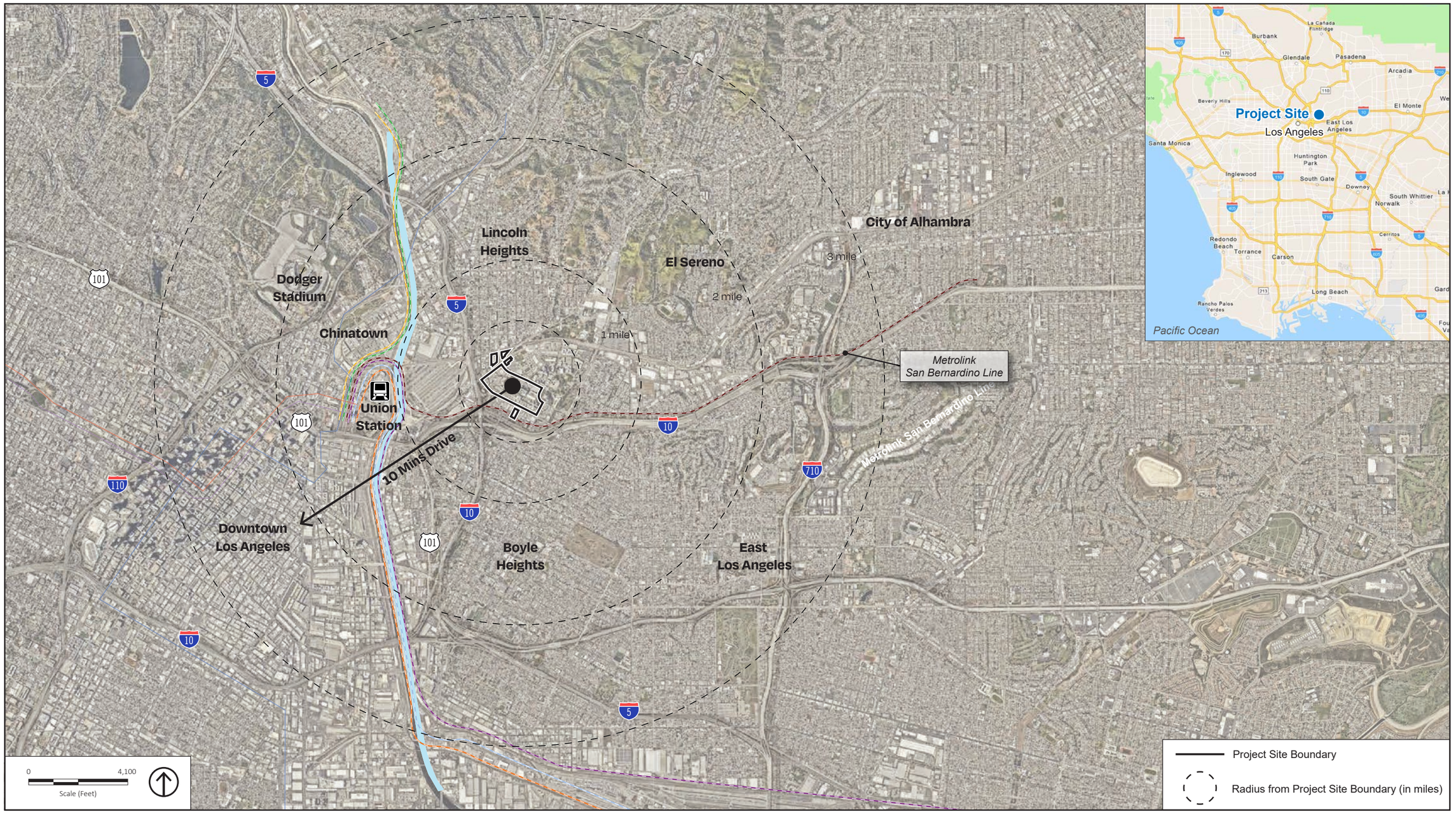
As shown in Figure 2-2, *Project Site Boundaries*, the Project Site includes a main campus and four additional areas separated from the main campus by local roadways; these areas that are not part of the main campus are referred to as the "non-contiguous areas" in this Draft SEIR. The four non-contiguous areas of the campus are referred to as the College of Nursing and Allied Health, located directly across Mission Road; Restorative Care Village (RCV), located at the northeast corner of Mission Road and Zonal Avenue; Big Blue, located at the southeast corner

of Mission Road and Zonal Avenue; and Parking Structure 9, off the main campus located on the opposite side of Marengo Street. In total, the Project Site is approximately 81.9 acres.[1] The approximately 71-acre main campus is located at 1200 State Street and is generally bounded by Zonal Avenue, Mission Road, Marengo Street, and Chicago Street. State Street bisects the main campus. While this Project Site is defined in order to identify potential environmental impacts in all areas in which future activities associated with the Proposed Project could occur, it is not intended to indicate that all parts of the Project Site would be redeveloped; some areas such as the existing Medical Center and the newly constructed RCV facilities, are not proposed for redevelopment as part of the Proposed Project.

A number of buildings and features associated with the medical uses of the Campus are located within the Project Site. As shown in Figure 2-3, *Local Vicinity*, the Campus is surrounded by a mix of institutional, medical, commercial, residential, and industrial uses. The Keck School of Medicine of USC campus and other institutional and medical uses are located on the opposite side of Zonal Avenue. Residences are located on the opposite side of Cummings Street and Chicago Street. Commercial uses are located on the opposite side of Marengo Street and residential uses are located further south on the opposite side of Marengo Street. Industrial uses are located south of Alhambra Avenue. Detailed descriptions of surrounding land uses and sensitive receptors are provided in the applicable technical sections in Chapter 3.0, *Environmental Analysis*.

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

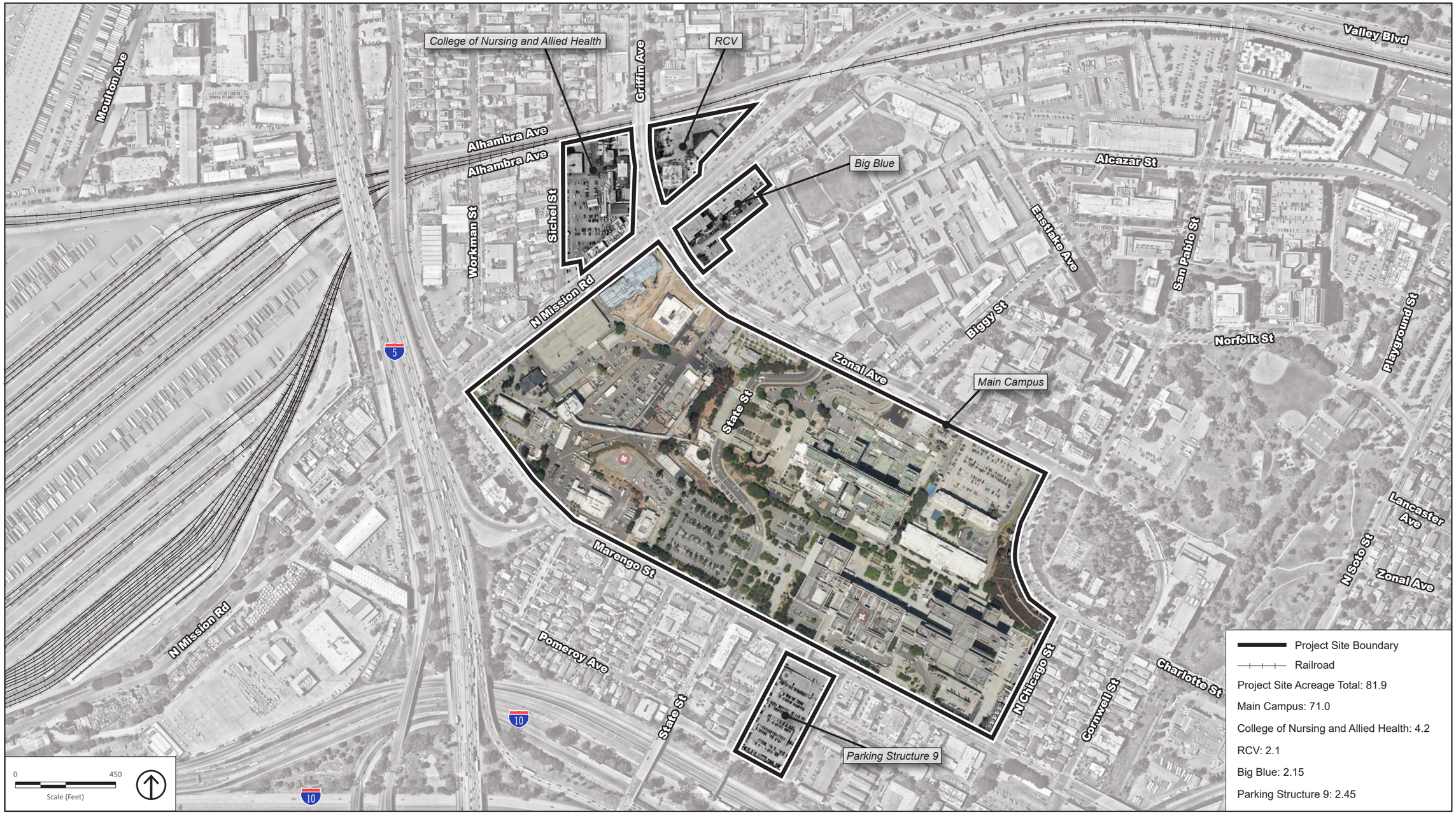
Figure 2-1 - Regional Location



Source: Rios 2025; GIS Pro, 2025.

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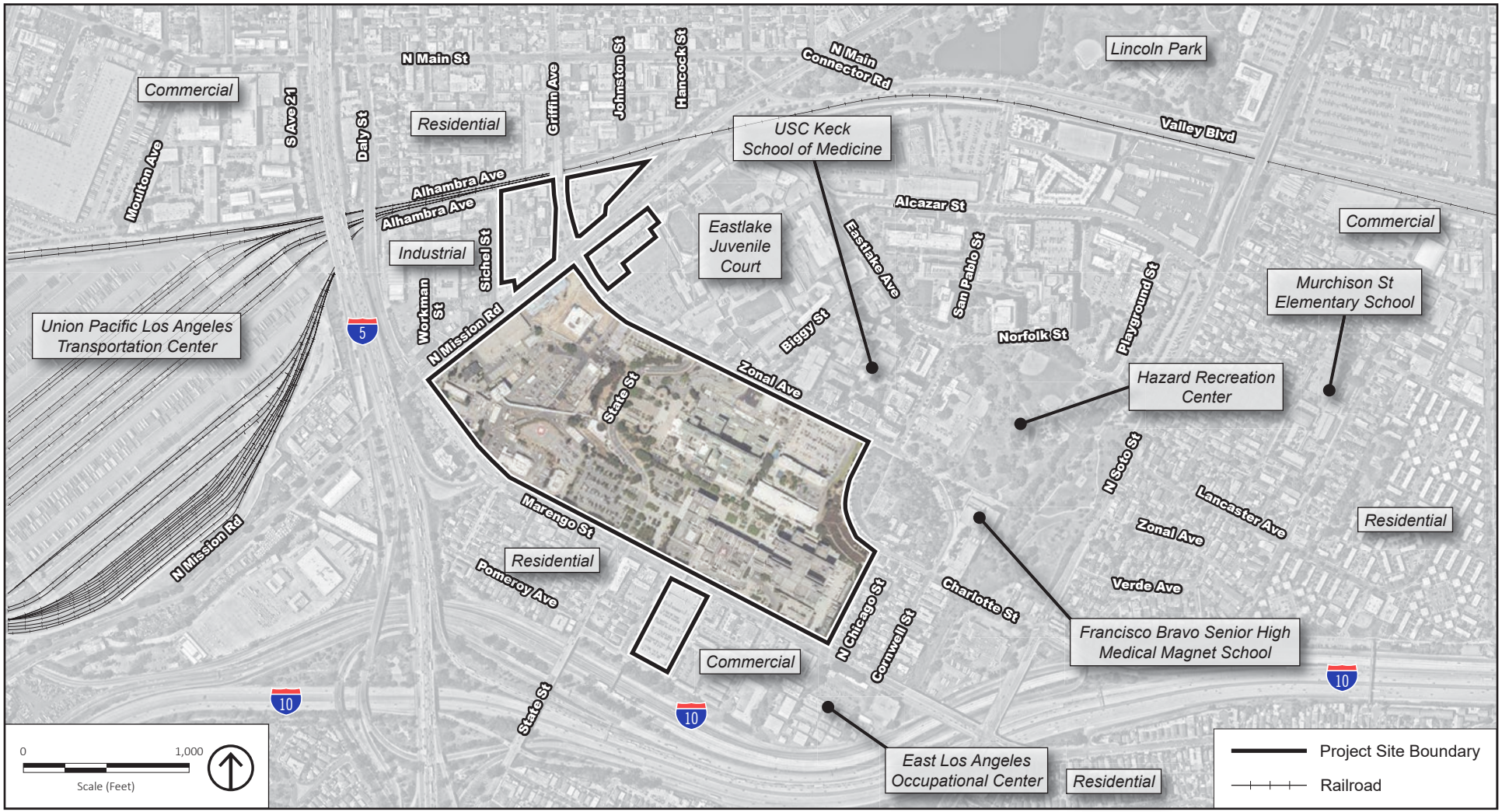
Figure 2-2 - Project Site Boundaries



Source: Nearmap 2025.

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Figure 2-3 - Local Vicinity



Source: Nearmap 2025.

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2.3 STATEMENT OF PROJECT OBJECTIVES

The primary purpose of the Proposed Project is to address some of the region's urgent challenges—that include, but are not limited to, housing insecurity, public health disparities, disconnection of the Project Site with the surrounding communities, and climate vulnerability—through a holistic framework rooted in health equity, synergetic infrastructure, and cultural resilience. Pursuant to State CEQA Guidelines Section 15124, the following objectives support the Proposed Project's purpose and will assist the County of Los Angeles in developing a reasonable range of alternatives to be evaluated in this SEIR. These objectives build on and are consistent with the objectives defined in the 2014 Master Plan EIR, which were as follows:

- Achieve a community-friendly campus
- Promote healthy lifestyles and wellness
- Maximize access to the Medical Center by the community
- Provide opportunities for appropriate education and job training
- Incorporate on-campus business opportunities
- Plan for future program development

2.3.1 Proposed Project Objectives

HEALTHCARE, PUBLIC HEALTH, AND WHOLE-PERSON WELLNESS

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

HOUSING AND ECONOMIC OPPORTUNITY

3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.
4. To maximize the provision of new housing, including affordable, supportive, workforce, market rate, and other needed housing types, to address housing needs of the County and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.

6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.

CIRCULATION, ACCESS, AND OPEN SPACE

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

INFRASTRUCTURE, SUSTAINABILITY, AND RESILIENCE

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

2.4 PROJECT CHARACTERISTICS

2.4.1 Project Overview

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

The approximately 51.1 acres of the Project Site that are not subject to the proposed Master Plan would continue to be governed by the previously approved 2014 Master Plan and its associated development parameters. Certain previously approved land uses that were identified in the 2014 Master Plan that have not yet been implemented to date have been carried forth into this Draft SEIR. These uses include Community Facilities, Clean Tech/Light Industrial, Medical Office, General Office, and Hospital[2]. Because development within the areas of the Project Site outside of the Master Plan Boundary would continue to occur pursuant to the 2014 Master Plan, this Draft SEIR evaluates potential environmental impacts associated with a conservative, maximum development scenario across the entire Project Site to ensure that a full range of potential redevelopment on the Project Site is considered.

The Proposed Project includes the following land uses, which are described in more detail in this chapter:

- Residential, including, but not limited to, affordable housing
- General and medical office space
- Commercial and retail uses
- Patient and Caregiver Lodging
- Community Facilities
- Educational uses
- Warehousing space
- Clean tech and light industrial development
- Hospital uses
- Parking
- Open space and landscaping
- Campuswide infrastructure improvements

In addition to a description of these proposed uses, a summary of the overall approach to adaptive reuse of the General Hospital Building, which is a part of the Proposed Project, is also provided.

[2] The 2014 Master Plan EIR used different land use nomenclature for the proposed uses under the 2014 Master Plan. The land use titles under the 2014 Master Plan included: Wellness-Oriented Community Facilities, New Utility Plant and Facilities, Outpatient Clinics/Laboratories/Medical Office, Professional/Administrative Office, Research and Development, Hospital Addition, Warehouse/Storage, and Residential Care Facilities. Land uses that would be carried over under the Proposed Project include: Wellness-Oriented Community Facilities (Community Facilities), New Utility Plant and Facilities (Clean Tech/Light Industrial), Outpatient Clinics/Laboratories/Medical Offices (Medical Office), Professional/Administrative Offices (General Office), Hospital, and Research and Development (Clean Tech/Light Industrial).

2.4.2 Proposed Project Land Uses

Table 2-1, *Proposed Project Land Uses*, summarizes the maximum anticipated development proposed on the Project Site by land use type. The numbers in Table 2-1 represent the maximum amount of development that could take place on the Project Site and are used as the basis for the environmental assessment in this Draft SEIR. The quantities of each land use are based on information contained in the proposed Master Plan. Future redevelopment proposed to be implemented on the Project Site, would occur in phases over an estimated 25 years; the actual number of units and quantities of land use types would be determined as individual project elements are implemented and could be less than the maximum envelope analyzed in this Draft SEIR. In addition, the precise distribution of land uses, square footage, and associated population among individual land use categories may vary over time from the figures provided in response to operational needs, and some variation is anticipated in the EIR analysis, provided that the overall development intensity analyzed in this Draft SEIR, would not be exceeded.

Table 2-1 Proposed Project Land Uses

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

Figure 2-4, *Conceptual Campus Programming*, provides an illustrative depiction of where future uses could be located within the Project Site. As identified in Figure 2-5, *Conceptual Hubs and Corridors,* a description of the three conceptual hubs is as follows:

- The **Commerce Hub** would be located within the western portion of the main campus and would serve as the community-facing center of economic activity, cultural celebration, and daily life. The Commerce Hub could include mixed-uses consisting of community-oriented retail, small businesses, incubator space, and cultural uses that would support local entrepreneurship and creative expression.
- The **Historic Hub** would be centered on the Forecourt and General Hospital Building. Recreational facilities, open space, and food-oriented programs such as a kitchen and restaurant incubator or mercado food hall could be provided in the Historic Hub.
- The **Medical Hub** would be centered on the Los Angeles General Medical Center (LA General Medical Center) and would build on the Project Site's role as a center for care while expanding access to community-oriented health services. Supporting amenities could include grab-and-go food and beverage, wellness garden and respite spaces to serve patients, visitors, doctors, nurses, and staff.

A description of the three conceptual corridors is provided below:

- The **Community Corridor** would form the central civic spine and would link the Commerce Hub to the Historic Hub. This corridor could support community activities including markets, events, and informal daily use.
- The **Wellness Corridor** would link the Medical Hub and the Commerce Hub. This corridor would be designed to support movement, prevention, and recovery. Additionally, this corridor would integrate active living routes, shaded seating, and wellness-oriented programming.
- The **Innovation Corridor** would connect the Medical Hub and the Historic Hub and would focus on health-related innovation, research, training, and entrepreneurship. This corridor could be lined with flexible spaces for incubators, educational programs, and supportive services. This corridor would support collaboration between institutions, community, organizations, and emerging enterprises.

Precise locations, massing, square footage, and resulting densities (population and employment) may evolve as the Proposed Project is implemented in phases. For purposes of analysis in this Draft SEIR, the development program presented in Table 2-1 represents the maximum development scenario evaluated. While the table identifies anticipated square footages and population associated with specific land uses, the allocation of square footage and uses may be distributed in different configurations across the Project Site during implementation, and within the overall development program and intensity analyzed in this Draft SEIR.

Provided below is a description of the anticipated land uses under the Proposed Project.

RESIDENTIAL

As identified in Table 2-1, up to 3,200 housing units could be developed within the Project Site. Of these units, a minimum of 25 percent would be designated as affordable. This land use category would permit multi-family housing and mixed-use developments with residential and commercial components, as well as adult residential facilities, family childcare homes, l foster family homes, group homes for children, joint live/work units, residential substance use recovery facilities, rooming and boarding houses, and small family homes for children (as defined in Los Angeles County Code of Ordinances Section 22.140.530). Unit types would vary in size and would be designed to accommodate a variety of household types and could be for rent or sale. As further described under "Summary of General Hospital Adaptive Reuse," below, the General Hospital Building, within the Los Angeles General Hospital - Acute Unit Building Historic District, is conceptually planned to be adaptively reused to accommodate up to approximately 615 housing units, representing a portion of the proposed total of up to 3,200 housing units. The remaining residential units would be in the form of new construction in various parts of the Project Site. As discussed in detail below in Section 2.4.7, *Design Guidelines*, of this chapter, no structure or projection would exceed the highest elevation point of the roof structure or parapet wall of the existing General Hospital Building, which stands at 19 stories tall or approximately 240 feet above ground level.

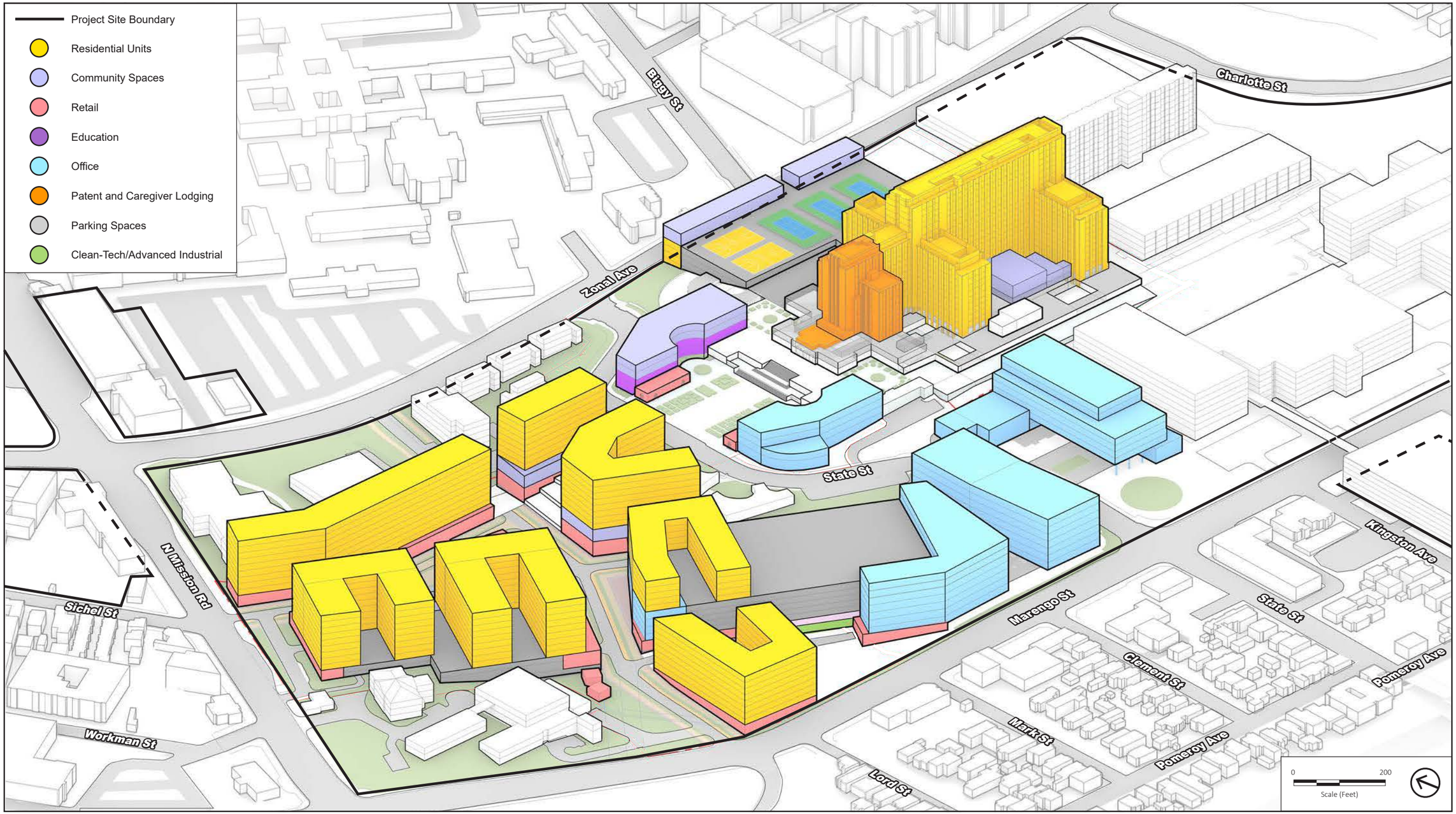
GENERAL OFFICE AND MEDICAL OFFICE

The Proposed Project includes development of up to 735,300 square feet of medical office use and up to 400,000 square feet of general office use within the Project Site. Medical office uses would support the larger hospital uses on the Project Site. Permitted medical offices could include dental offices and laboratories integrated with office uses. General office uses would include business or professional offices space.

COMMERCIAL/RETAIL

The Project Site would also be redeveloped with up to 320,000 square feet of commercial/retail uses. Uses permitted within this land use would include farmer's markets, general retail (e.g., grocery stores/supermarkets, foodstuffs, beverages, secondhand, and specialty goods), , banks, barber and beauty shops, bars and cocktail lounges, bicycle rentals, dry cleaning drop-off and pick-up services, movie theaters, pet grooming services, photocopying and duplicating services, photography studios, printers and publishers, repair shops, restaurants and eating establishments, tourist information, and veterinary clinics. As further described under "Summary of General Hospital Adaptive Reuse," below, the General Hospital Building would be adaptively reused to include up to 90,000 square feet of the commercial/retail space.

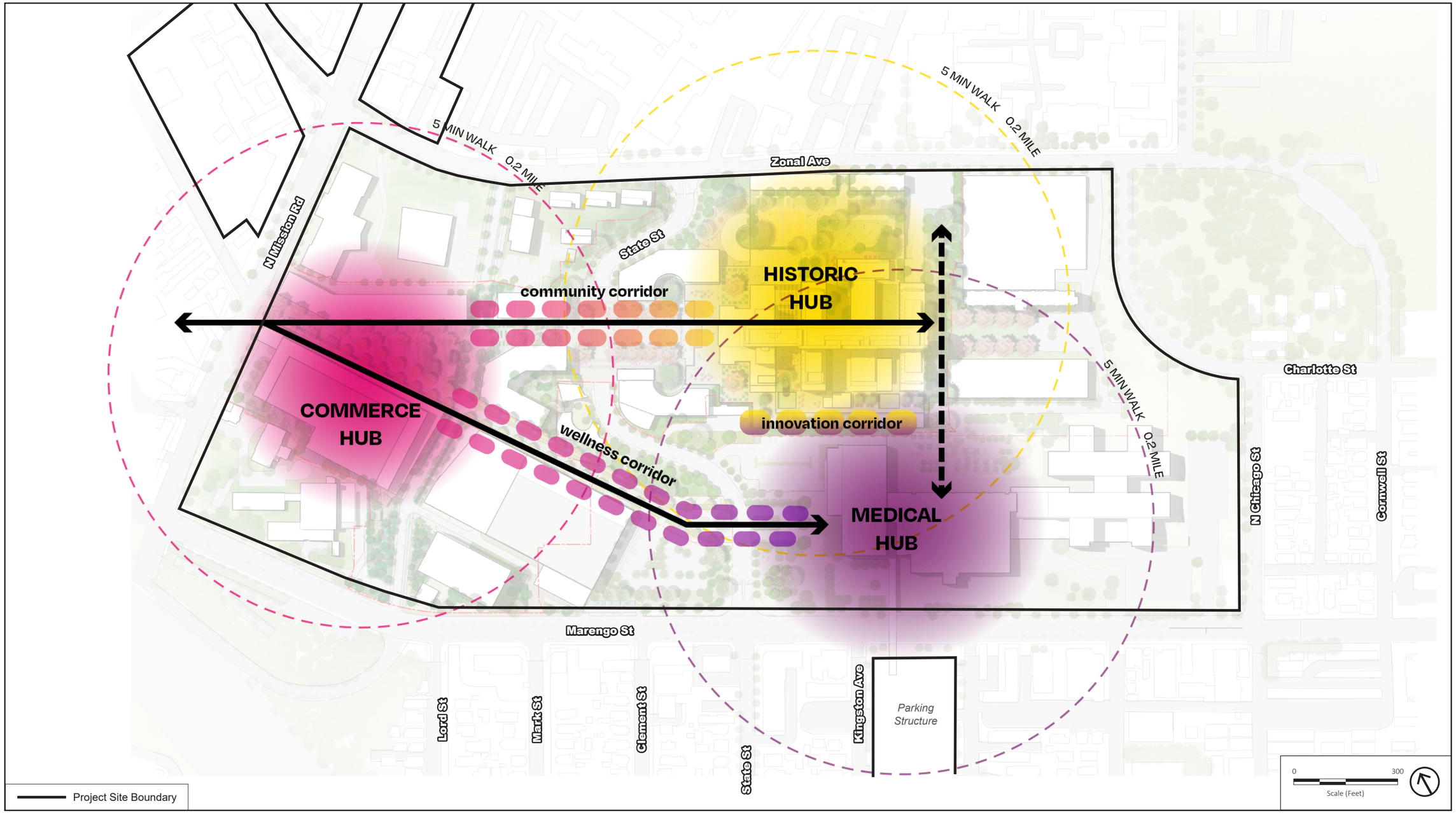
Figure 2-4 - Conceptual Campus Programming



Source: RIOS 2025.

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Figure 2-5 - Conceptual Hubs and Corridors



Source: RIOS 2025.

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PATIENT AND CAREGIVER LODGING

The proposed patient and caregiver lodging use would provide accommodations for onsite users (as opposed to general tourism lodging). It would allow for up to 200 rooms on the Project Site, some or all of which could be located within the General Hospital Building. These rooms are intended to serve patients, families, and visiting staff of the LA General Medical Center. As further described under "Summary of General Hospital Adaptive Reuse," the General Hospital Building is conceptually planned to be adaptively reused to include up to 91,000 square feet of patient and caregiver lodging use and up to 200 rooms.

COMMUNITY FACILITIES

The Proposed Project would include up to 350,000 square feet of community facilities uses throughout the Project Site. Permitted community facilities uses would include community gardens, farming, auditoriums and event spaces, museums, adult continuing education (business, trade/extension school, and professional), health clubs, gymnasium, parks, recreational clubs, riding and hiking trails, sauna and steam baths, swimming pools, kitchens and commissary kitchens (including street vendors), and day care facilities. This use would also permit domestic violence shelters and emergency shelters.

EDUCATIONAL FACILITIES

The Proposed Project could include development of up to 110,000 square feet of educational/school uses, which could be a public or private transitional kindergarten (TK) through 12th grade.

WAREHOUSE

The Proposed Project would include up to 160,000 square feet of storage facilities/warehouse uses.

CLEAN TECH/LIGHT INDUSTRIAL

The Proposed Project would include up to 200,000 square feet of clean tech/light industrial uses. The proposed clean tech/light industrial land use would permit the following uses: clean technology and light industrial, accessory technology infrastructure uses (server and data processing functions); laboratories (research and testing); light manufacturing (artistic and artisanal goods, alcoholic beverages, cosmetic and pharmaceutical, food and drink, garment and accessory, general, and textile); and scientific research or experimental development of materials, methods or products.

HOSPITAL

Under the 2014 Master Plan Project, the County identified the potential development of up to three new inpatient towers with 150 beds each (450 beds total) in the area now occupied by the Outpatient Department (OPD) building, Interns and Residents Dorm (IRD) building, and Parking Structure 12. Those previously approved uses have not been developed and are carried forward under the Proposed Project.

PARKING

For the purposes of this analysis in this Draft SEIR, a conservative parking assumption was used consistent with the broader buildout scenario. Specifically, 3,005,678 square feet of parking uses were assumed, equivalent to approximately 8,588 parking stalls, which includes replacement parking as a result of any existing parking to be removed as part of Proposed Project. As described, this Draft SEIR assumes a conservative buildout scenario reflecting maximum allowable uses on the Project Site, and development would occur in multiple phases over an extended period. Parking would be delivered concurrently with the uses it is intended to serve, and parking demand would be evaluated on a project-by-project basis to account for changes in travel behavior, including reduced reliance on automobiles through transportation demand management measures implemented as part of this project.

The Proposed Project would include sufficient parking spaces to accommodate demand, with no parking minimums (pursuant to Assembly Bill 2097 [2022]), within the Project Site. Parking would be accommodated in structured and surface parking areas, and could include subterranean levels. Parking areas would be strategically located to accommodate the various uses at designated locations, in consideration of the three main access points into the Project Site (from Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue). Centralized parking would be paired with active parking management strategies to balance parking demand across the different user groups and peak periods. Parking structures are anticipated to range from three to seven above-ground levels.

All faces of a parking structure that would be visible from a roadway would receive appropriate design treatment. Additionally, all faces of a parking structure that would be visible from public and residential areas would be screened to reduce light and glare. This would be achieved through design features such as incorporating the use of color, screening, art, green walls, or supergraphics.

SUMMARY OF GENERAL HOSPITAL ADAPTIVE REUSE

The approximately 1.2 million square foot General Hospital Building has been largely vacant since 2008. As further described in Chapter 3.4, *Cultural Resources*, the General Hospital Building (known as the Los Angeles County General Hospital - Acute Unit Building) and an area

surrounding the building, known as the Los Angeles General Hospital - Acute Unit Historic District, are historical resources pursuant to CEQA. The Proposed Project includes the adaptive reuse of the Los Angeles General Hospital – Acute Unit Building and its associated ancillary buildings and features that together comprise the Los Angeles General Hospital - Acute Unit Building Historic District to accommodate a range of uses that are included in Table 2-1.

Potential General Hospital Building Uses

While the ultimate uses and quantity of uses may change, based on early feasibility studies, it is anticipated that uses within the General Hospital Building could include residential, commercial, office uses, patient and caregiver lodging, and community facilities. Table 2-2, *Conceptual General Hospital Reuse Programming*, provides a breakdown of approximate square footage for anticipated uses within the General Hospital Building.

Table 2-2 Conceptual General Hospital Adaptive Reuse Programming

Proposed Use	Square Footage Range
Residential	400,000–500,000 (approximately 615 residential units)
Commercial/Office/Community Facilities	80,000–90,000
Patient and Caregiver Lodging	9,000–91,000 (up to 200 rooms)

The square footages presented above reflect conceptual programming for active uses and do not represent the full building area. Remaining space within the building would include retaining historic interior features, internal circulation areas, building services (e.g., mechanical equipment and utility space), and other non-programmable areas. Building amenities to support these land uses are conceptually planned to include, but not be limited to, a community garden(s), pool, barbecue and dining area(s), lounges, sports courts, community event spaces, and daycare facilities, and are anticipated to be interior to the General Hospital Building and on the roof of an accompanying proposed parking structure.

In addition to the work within the General Hospital Building, other improvements within the Los Angeles General Hospital - Acute Unit Building Historic District are proposed. Within the Forecourt area, which is the publicly accessible entrance to the General Hospital Building, improvements would be made in consideration of the larger Master Plan vision. Improvements within the historic district would be implemented in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties (Standards). The existing Forecourt features, such as landscaping and pavers that in some areas are in poor condition, could be removed and enhanced to allow for improved accessibility and safety. Subsurface infrastructure connections may be installed. Existing texture and patterns would remain and the Forecourt would remain as an outdoor space and gateway to the General Hospital Building.

Anticipated General Hospital Building Construction Activities

While the precise construction activities to be conducted would be determined through future design and engineering studies, the following discussion provides anticipated construction activities that could be anticipated within the General Hospital Building and proximate historic areas, for purposes of analysis of environmental impacts in this Draft SEIR. In addition to these construction activities, remediation and/or removal of hazardous materials would occur. This description of anticipated activities provides further refinement from that analyzed in the Los Angeles County General Hospital & West Campus Stabilization Project EIR Addendum that was approved by the County in 2025.

Rehabilitation of the General Hospital Building would undergo "soft demolition" of non-essential and non-historic elements, including outdated/deteriorating mechanical, electrical, and plumbing (MEP) systems; interior finishes, interior partitions, and other non-loadbearing components; and hazardous materials.

The General Hospital Building would be re-roofed and new mechanical equipment and outdoor patios would be added. A portion of the north elevation at the basement and 1st to 3rd floors would be demolished to accommodate the integration of a new parking garage. Along the south elevation of the 1st floor, new openings would be created at the west and east ends of a concrete retaining wall and would provide access to the lobby.

The General Hospital Building would also undergo critical seismic strengthening. New foundations would be added at the basement level, maintaining existing floor elevations. New shear walls would be added at all floors, requiring demolition and reconstruction at corridors. New reinforced concrete super walls would avoid high integrity historic spaces within the building and help limit the amount of earthquake movement that would affect exterior elevations.

In the interior of the General Hospital Building, the 1st floor and historic lobby would continue to serve as the primary entrance and circulation, with the central corridor acting as an interior street. Existing 1st floor rooms would be reconfigured and finished to prepare for future uses.

With the exception of a portion of the north elevation walls and the removal of some original interior finishes and features as described above, the vast majority of the building's character-defining features and materials enumerated would be preserved under the Proposed Project.

The Patient's and Visitor's buildings in the Forecourt area would be retained and would receive interior tenant improvements. State Street, the existing gateway at Marengo Street, and the west and east gateways at Zonal Avenue would be retained. The historic central gateway may be relocated further east along Zonal Avenue, within the Los Angeles General Hospital - Acute Unit Building Historic District. The open area comprising the Entrance Forecourt would be retained. While portions of the Forecourt paving may be reconstructed, the new paving would match the

historic gridded design. New contemporary pedestrian lighting may be added to the Forecourt area. Historic cypress and olive trees would be retained or replaced in kind, and the rest of the Forecourt would receive new landscaping.

Most extant retaining walls, particularly those along the western edge of the Los Angeles General Hospital - Acute Unit Building Historic District boundary, providing support along the promontory, would be retained, with limited sections demolished to accommodate new development.

As further discussed in Section 2.4.7, *Demolition Activities*, of this chapter, and Chapter 3.4, *Cultural Resources*, a number of non-historic buildings and features within the Los Angeles General Hospital - Acute Unit Building Historic District would be demolished to accommodate new programming within the Los Angeles General Hospital - Acute Unit Building Historic District, and new infill construction would be added. New construction would be designed to be compatible with the size, scale, massing, height, and overall design of contributing buildings, structures, and site features within the Los Angeles General Hospital - Acute Unit Building Historic District, in conformance with the Project Design Features listed below.

Project Design Features

Included as part of the Proposed Project, all work to the General Hospital Building and within the Los Angeles General Hospital - Acute Unit Building Historic District is required to comply with the Secretary of the Interior's Standards for Rehabilitation ("the Rehabilitation Standards") as part of the ongoing federal historic preservation tax credit application process for the property. A qualified Historic Architect or Architectural Historian meeting the Secretary of the Interior's Professional Qualifications Standards will continue to review the Acute Unit drawings as the design progresses to ensure that the design conforms with the Rehabilitation Standards. Key features that make up the historic elements of General Hospital Acute Unit will be retained and incorporated into the design. This includes but is not limited to:

- **Primary Corridors (all levels):** Existing walls to be demolished and reconstructed to a similar configuration. Existing terrazzo and steel wainscotting to be removed, abated, and stored for reinstallation at the reconstructed corridors.

- **Entry Lobby (1st floor, 2nd-story space):** All materials will be protected and finished in place. Through traffic in this area would be minimized during the cleanout, abatement, selective demolition, and seismic demolition phases.

- **Kitchen (1st floor, 2nd-story space):** Maintain the configuration of double-height space. There are no known materials or finishes to protect in place.

- **Library (2nd floor):** All materials, finishes, and fixtures will be protected in place. Through traffic in this area would be minimized during the cleanout, abatement, selective demolition, and seismic demolition phases.

- **Morgue (2nd floor):** All materials, finishes, and fixtures will be protected in place. Through traffic in this area would be minimized during the cleanout, abatement, selective demolition, and seismic demolition phases.

- **Surgery Theater, Operating Room No. 1 (15th-17th floors):** All materials, finishes, fixtures, and equipment will be protected in place. Through traffic in this area would be minimized during the cleanout, abatement, selective demolition, and seismic demolition phases.

- **Operating Rooms (6 total, 15th floor):** Existing demising walls would be demolished. Floor tiles will be protected in place for the incorporation into the future residential program planning.

In addition, to ensure that no impacts would occur to the identified historic resources and that all applicable standards and guidelines are followed, the following Project Design Features (PDFs) would be implemented as part of the Proposed Project.

Project Design Features: General Hospital – Acute Unit District and Building

PDF-1. All work within the Los Angeles General Hospital – Acute Unit Historic District and the treatment of all its contributing buildings, structures, and site features, as well as the rehabilitation of the Acute Unit Building and the treatment of all its exterior and interior character-defining features and materials, shall be overseen by a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards. The Historic Architect shall review all drawings and specifications at major milestones (50% and 100% Schematic Design, Design Development, and Construction Documents) to ensure continued conformance with the Rehabilitation Standards and National Park Service guidance. New construction within the Acute Unit Historic District shall adhere to Rehabilitation Standards No. 9 and 10 and the guidance related to new construction.

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

PDF-2. Prior to commencement of any construction activities associated with the Los Angeles General Hospital – Acute Unit Building's exterior or interior character-defining features, or the Acute Unit Historic District's contributing features (Patient's and Visitor's buildings, retaining walls, gateways, State Street, Forecourt, tunnel), a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to monitor all disassembly,

construction and rehabilitation activities, to ensure appropriate treatment of exterior and interior character-defining features, materials, and spaces during the construction project.

PDF-3. Prior to undergoing any demolition at the Los Angeles General Hospital – Acute Unit Building and any other contributing features within the Acute Unit Historic District (Patient's and Visitor's buildings, retaining walls, gateways, State Street, forecourt, tunnel), that would result in the removal of interior or exterior character-defining features (or portions thereof), Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level II photographic documentation shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards. HABS/HAER Level II drawings and historical narrative may follow after construction commences. To ensure public access, the Project Applicant(s) shall submit documentation to the following archives/organizations: Library of Congress, HABS/HAER/HALS Collection; Los Angeles Conservancy; County of Los Angeles Library; and other entities/repositories to be identified by the Historic Architect.

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

Project Design Features: Support Services Site

The Proposed Project also includes PDFs related to the Support Services Site, which was previously identified as an eligible historic district. While the Support Services Site was largely demolished in the late 1990s and 2000s and no longer retains sufficient integrity to convey its significance as a historic district, the site played an important role in the history and development of the hospital. The Pharmacy and Viaduct, which had been identified as contributors to the Support Services Site, are the only remaining vestiges of the Support Services Site and would be demolished under the Proposed Project. The following PDFs would document and interpret these resources and their associations with the history and development of Los Angeles County General Hospital.

PDF-4. Prior to demolition of the Pharmacy Building and Viaduct, Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level II photographic documentation shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards and a qualified structural engineer with at least five years of demonstrated, related experience. HABS/HAER Level II drawings and historical narrative may follow after demolition. To ensure public access, the Project Applicant(s) shall submit documentation to the following archives/organizations: Library of Congress, HABS/HAER/HALS Collection; Los Angeles Conservancy; County of Los Angeles Library; and other entities/repositories to be identified by the Historic Architect.

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

PDF-5. An Interpretation Plan shall be prepared and implemented for the "Support Services Site" that originally comprised the west half of the Los Angeles General Hospital main campus and that was largely demolished and redeveloped following the 1994 Northridge earthquake. Interpretation may include online (i.e. in the form of a StoryMap) or on-site display(s) of historic photographs, historic maps, or other historic materials accompanied by a narrative of the history and development of the General Hospital. A team of qualified professionals with at least five years of demonstrated, related experience shall prepare a preliminary Interpretation Plan which shall be presented at a public workshop at which members of the community and interested constituent groups will have the opportunity to provide feedback that will be considered in the development of the plan.

2.4.3 Circulation and Access

The Proposed Project could include up to seven vehicular entrances to the main campus: two via State Street, one at Marengo Street, two via Mission Road, and two via Zonal Avenue. Signalization could occur at Marengo Street and a new entrance to the Project Site. The proposed redevelopment within the main campus would be in consideration of the three primary arrival points that currently occur at the main campus: LA General Medical Center (from Marengo Street and State Street), Central Campus (from Zonal Avenue and State Street), and West Campus (from Mission Road). The three primary arrival points would form a hub centered around the major uses located at the main campus: the Medical Hug (centered on the LA General Medical Center), the Historic Hub (centered on the General Hospital Building), and new Commerce Hub (within the western portion of the main campus). As previously discussed, the three hubs would be linked through three primary corridors including the Wellness Corridor, Community Corridor, and Innovation Corridor. The Wellness Corridor would link the Commerce Hub to the Medical Hub; the Innovation Corridor would link the Medical Hub to the Historic Hub; and the Community Corridor would link the Historic Hub to the Commerce Hub.

As previously discussed, parking facilities for each hub would be appropriately sized to meet the demand of the Proposed Project and be located at centralized locations in structured or surface lots. Additional car and shuttle drop-off points would be provided at key circulation points, such as at the Forecourt and Medical Center entrance. The proposed circulation plan would emphasize multimodal access, pedestrian comfort, accessible design, and seamless internal and regional connections. Key circulation features anticipated are as follows:

- **Mobility Hub:** A Mobility Hub could be strategically located to enhance access to existing surrounding bus lines and the existing internal campus shuttle. Other multimodal features such as bicycle parking and repair stations, shade and seating areas, rideshare drop-offs, a fleet of car-share vehicles, and bus charging infrastructure, could be provided.
- **Shuttle Circulation:** Two existing Campus shuttle routes serve the Campus. The Proposed Project would expand the routes to improve circulation throughout the main campus. Shuttle stops would be aligned with key drop-offs, gateways, and destinations. A central shuttle branch is proposed along the Wellness Corridor and would permit only authorized vehicular access within the bollard-protected pedestrian zone.
- **State Street Spine:** The existing alignment of State Street through the Project Site would be maintained, and the roadway could be transformed into a central access feature to support vehicles, pedestrians, and bikes, and include Americans with Disabilities Act (ADA)-compliant pathways.
- **Central Spine:** The Central Spine would form the primary axis to connect the western portion of the main campus to the eastern portion of the main campus. The Central Spine would provide a direct and visible pedestrian pathway and would increase connectivity between the western and eastern portions of the main campus.

- **Pedestrian Network:** The Proposed Project could include a layered system of trails, ramps, elevators, stairways, and terraces to connect open spaces and key destinations in consideration of the unique topographic grade changes on the Project Site. The proposed street-level plan would be designed to encourage movement and comfort, with curb-less streets, textured pavers, shade trees, lighting, seating, and landscape amenities to define a public realm. The Proposed Project would include a pedestrian-protected road, which would prevent non-emergency vehicular traffic using motorized bollards, and could be accessed from either Zonal Avenue, Mission Road, or Marengo Street. These bollards could be removed to allow emergency vehicles to get through the area.
- **Accessible Pathways and Fitness Loop:** Site grading would use excavated fill to reduce slopes along primary streets to less than five percent. The Proposed Project could provide a connected network of fitness pathways within the main campus. Along the routes, exercise stations, pocket parks, and shaded rest areas could be provided.
- **Bicycle Path:** Bicycle circulation on the Project Site builds on the existing Class II bikeway along Mission Road, which connects to networks along the Los Angeles River and towards Downtown Los Angeles. Public bicycle parking stations would be provided at each entry point of the main campus. Within the main campus, the Proposed Project would provide dedicated bicycle lanes along the Wellness Corridor and State Street. Each proposed residential building would include secure, residential-only bicycle parking. Designated bicycle parking would be provided on Marengo Street, at the State Street entrance, and at the primary Mission Road entrance.
- **Service and Emergency Access:** The Proposed Project would include a service loop to support County of Los Angeles Department of Health Services (DHS) trams, waste transfer, loading, and deliveries with minimal public interference. Service and loading operations would be consolidated along a proposed dedicated service entry, potentially from Marengo Street. This service corridor would provide controlled access to County uses. The loading dock for the adaptive reuse of the General Hospital Building would connect to the existing basement service network at the east end of the building. Loading areas would be designed to be located away from primary pedestrian ingress and egress areas by at least 20 feet. Wherever feasible, loading areas would be located at the rear of the building. The Proposed Project's street network would be designed to provide comprehensive fire and emergency access to all buildings within the main campus while preserving the existing access lanes to facilities outside the main campus.

2.4.4 Open Space and Landscaping

The parts of the Project Site governed by the Master Plan would be developed with a balance of publicly accessible and private (residential) open space, in an amount that would correspond to a minimum of ten percent of the building footprint.

As future projects are developed, existing trees, including mature and/or protected trees, may be removed across the Project Site (see Chapter 3.3, *Biological Resources* for more information about existing onsite trees). The proposed landscape design would emphasize local biodiversity through the use of native and adaptive plant species that promote drought-resistant planting, ecosystem regeneration, and habitat integrity. The approach would be intended to strengthen ecological function and reduce irrigation demand.

PUBLICLY ACCESSIBLE OPEN SPACE

A conceptually planned network of open spaces would include the following elements.

Landscaping: Landscaping throughout the Project Site would include California native drought-tolerant lawns, shrubbery, flowers, or trees, which would be continuously maintained. Publicly accessible walkways may be developed in the landscaped areas. Landscaping may be a part of the building, such as internal atriums and ground-floor planters. New ground-floor uses facing major circulation routes would include activated, accessible frontages with public areas, shaded seating, and landscape buffers. Residential development would share public open spaces such as front porches to encourage interaction.

- **The Forecourt:** The Forecourt would remain as the civic heart for large-scale events and daily community use (markets, movie nights, performances). The Forecourt would be brought up to modern standards, and all textures, patterns, vegetation would remain. Focused replacement of trees that are in poor condition would occur.

Neighborhood Open Spaces: Courtyards, pocket parks, edible community gardens, exercise stations, pocket parks, pollinator habitats, shaded rest zones, and rooftop gardens would be located throughout the Project Site to be integrated with future development.

Public Art and Signage: Civic art would be incorporated in the Proposed Project in compliance with the County's Civic Art Policy, which requires one percent of the project cost to be dedicated to civic art. Civic art could include murals, sculptures, interactive installations, and other forms of art integrated throughout the campus. Temporary art features, such as installations on construction fencing, could also be implemented during the construction phase.

- The public realm would reinforce a cohesive district identity while supporting intuitive navigation and opportunities for local cultural expression.

- **Wayfinding:** Multilingual, ADA-compliant signage at entries, nodes, and destinations would be provided across the Project Site. Additionally, the Proposed Project would incorporate a cohesive design across the Project Site with intuitive orientation logic.

Branding: Unifying visual identity would be applied through furnishings, fixtures, lighting, signage, and paving, allowing site-wide cohesion with localized storytelling.

A Central Park could be provided through grand terraced gathering space that would be designed to connect key places within the main campus. The Central Park could be aligned with the Central Spine and extend from the Historic Hub to the Commerce Hub.

RESIDENTIAL OPEN SPACE

Private open spaces would be integrated into future residential development to include but not limited to rooftop amenities, dedicated residential fitness facilities, pool/fitness courts, coworking spaces, libraries, balconies, and recreation rooms.

2.4.5 Infrastructure Improvements

The Project Site would undergo comprehensive updates to the infrastructure network on the Project Site, in order to meet the needs of the proposed land uses. Future potential removal and upgrade of potable water lines, sewer lines, a stormwater system, electrical lines, natural gas, and steam infrastructure during future phases of construction would primarily involve grading and trenching to replace and install new infrastructure, as needed. This would include decommissioning and demolition of existing outdated and inefficient energy and water distribution/collection systems including the existing West Central Plant, consistent with assumptions in the 2014 Master Plan EIR. The West Central Plant is currently operating with significant capacity loss and unsafe infrastructure. The Proposed Project may include development of a new centralized energy distribution system (utility plant), or a broader system of electrical and natural gas infrastructure, which is included in the 200,000 square feet of clean tech/light industrial shown in Table 2-1. This could include interim infrastructure that may be needed, given the phased redevelopment of the Project Site. All new building construction would comply, at minimum, with the California Building Standards Code (California Code of Regulations, Title 24).

Similarly, new water (through coordination with City of Los Angeles Department of Water and Power [LADWP]) and wastewater (through coordination with Los Angeles Sanitation Districts [LASAN]) infrastructure would be installed to replace existing outdated infrastructure. All replacement infrastructure would connect into existing mainlines and would be sized to appropriately serve the proposed development. All future development resulting from the Proposed Project would be required to adhere to the County of Los Angeles' Low Impact Development (LID) Standards (County of Los Angeles Code of Ordinances Chapter 12.84) to maximize capture and treatment of stormwater.

The Proposed Project's sewer and non-potable water network could be designed to maximize gravity wastewater capture and could allow for wastewater treatment and reuse as development phases are advanced. The network of sewer mains could vary from 8-inch to 18-inch diameter pipe laid beneath planned street and plaza spaces. The locations and sizing of

these on-site mains could allow for future gravity sewer connections appropriate to accommodate future program needs.

The new fire water service network designed for the Proposed Project could include 10-inch diameter fire water main connections which could extend from Marengo Street and Mission Road onto the main campus and connect to the existing fire water main. Fire and potable water service could extend into the Project Site following the routes of the circulation for ease of future connection, maintenance, and installation. The potable and fire water distribution network could be phased and sized to align with future development programming assumptions. It is anticipated that the new system of distribution could coincide with proposed roadway circulation patterns to create ease of future connections and connected loops to help improve long-term infrastructure resilience. At each connection point backflow prevention could be provided in a six-inch diameter potable water connection.

In addition to on-site improvements to infrastructure, some work may occur off-site within the City of Los Angeles, such as utility connections/replacements, public right-of-way improvements, and other related activities. Any future off-site improvements would be coordinated directly with and overseen by the appropriate agencies (i.e., LADWP, LASAN, City of Los Angeles Department of Transportation, City of Los Angeles Department of Public Works, etc.).

2.4.6 Use and Development Standards

Use and development standards are included as part of the proposed Master Plan. They are intended to guide future development and individual development projects would be reviewed for consistency with these standards.

HEIGHT AND VIEWS

Height for new buildings would be regulated based on both the building's height relative to the General Hospital Building (19 stories) and key views to the General Hospital Building from on-site locations and surrounding roadways. No structure or physical building projections would exceed the highest elevation point of the roof structure of the existing General Hospital Building (approximately 240 feet from ground level).

To maintain sightlines, wayfinding, and a circulation corridor that recognizes the visual prominence of the General Hospital Building and its importance as the heart of a new urban village, a central spine of open space that would be a minimum of 20 feet in width would run east to west within the Project Site from the center of the General Hospital Building's main entrance through the axis framed by the Forecourt buildings, between the footprints of new development, and continuing to the center of the Project Site.

STEP BACKS AND TERRACING

- On steep slopes, terracing strategies would be used to reduce perceived height and accommodate grade changes.
- Buildings could be built to the sidewalk (i.e., 0-foot minimum building setbacks from sidewalks)
- Building-to-building setbacks would be provided as required by the California Building Code.
- Step backs on upper floors would not be required for any new building.
- At least 50 percent of any building's ground floor façade that would be oriented towards the Central and Wellness Corridors would be composed of active uses with windows.

PARKING STRUCTURE DESIGN

All faces of a parking structure that would be visible from a roadway would receive appropriate design treatment. Additionally, all faces of a parking structure that would be visible from public and residential areas would be screened to reduce light and glare. This would be achieved through design features such as unique style and character, incorporating the color of use, screening, art, green walls, or supergraphics.

2.4.7 Demolition Activities

The Proposed Project includes the demolition of existing buildings, structures, storage containers, modular buildings, pavement, utilities, and landscaping. Table 2-3, *Buildings and Features to Be Demolished*, lists the buildings proposed for demolition, and Figure 2-6, *Buildings and Features to Be Demolished*, identifies the locations of the structures proposed for demolition. As shown in Table 2-3, demolition of all but six (6) buildings and structures have been previously analyzed in the 2014 Master Plan EIR and the Los Angeles County General Hospital & West Campus Stabilization Project EIR Addendum approved in 2025. Buildings 1 through 22 were approved for demolition under the 2014 Master Plan EIR and reconfirmed in the 2025 Addendum to the 2014 Master Plan EIR (Stabilization Project). Buildings 13 and 14 were approved for demolition under the 2025 Addendum to the 2014 Master Plan EIR.

Demolition of buildings 23 through 28 have not been previously evaluated. In order to provide a comprehensive analysis of the Proposed Project, environmental effects associated with previously approved demolition of these buildings is included in this Draft SEIR for informational purposes only as these activities do not constitute new information, substantial changes in circumstances or substantial project changes requiring subsequent or supplemental analysis under CEQA.

Table 2-3 Buildings and Features to Be Demolished

Building Number	Building Name/Number	Square Footage
1	Shed 1 (Pharmacy Trailer) (Bldg. #503)	1,010
2	Shed 2 (Pharmacy Trailer) (Bldg. #538)	5,650
3	West Central Power Plant (Bldg. #516)	17,860
4	Chiller (Bldg. #534)	1,320
5	Barracks D Building (Bldg. #104)	2,690
6	Barracks G Building (Thrift Shop) (Bldg. # 105)	2,340
7	Trailer 1 (east)/Trailer 3 (west) (Bldg. #111)	7,000
8	Parking Structure 10 (Bldg. #410)	326,578
9	Trailer 15 (Bldg. #407)	2,740
10	Trailer 8 (Bldg. #408)	5,390
11	Trash Compactor (Bldg. #506)	2,750
12	Annex Trailers (Bldgs. #522, #523, #524, #544)	7,030
13 [a]	Mason Shop (Bldg. #529)	4,200
14 [a]	General Laboratory Building (Bldg. #302)	24,980
15	Trailer 17 (Bldg. #309)	4,550
16	Mini Warehouse Building (Supply Chain) (Bldg. #120)	22,480
17	Trailer 126 (Bldg. #112)	11,670
18	Tram Shop (Bldg. #528)	1,470
19	Tram Shop Storage and Pressure Washer Building (Bldg. #536)	370
20	Outpatient Building (Bldg. #121)	215,460
21	Interns and Residents Building (Bldg. #122)	142,448
22	Parking Structure 12 (Bldg. #124)	425,600
23 [b]	Morgue Overflow Crypts	2,500
24 [b]	Pharmacy Building (Bldg. # 502)	49,033
25 [b]	Tunnel/Viaduct (Bldg. # 604)	9,900
26 [b]	Morgue Overflow Crypts (Bldgs. #525, #526 & #531)	2,570
27 [b]	Morgue Overflow Crypt (Bldg #535)	700
28 [b]	Storage Sheds	1,100
	Total	**1,301,389**

Notes: Building 1 through 22 approved for demolition under the 2014 Master Plan EIR and reconfirmed in the 2025 EIR Addendum to the 2014 Master Plan EIR (Stabilization Project)

a Approved for demolition under the 2025 EIR Addendum to the 2014 Master Plan EIR (Stabilization Project)

b Not previously evaluated for demolition.

2.4.8 Construction Activities

For purposes of the analyses contained in this Draft SEIR, it is assumed that full buildout of land uses included in the Proposed Project would occur within an estimated 25-year period (from 2026 through 2050). Components of the Proposed Project would be developed as each phase of the Proposed Project advances, and as funding allows. It is assumed that construction activities associated with various projects could occur simultaneously, including construction to support adaptive reuse of the General Hospital Building.

Site preparation for new construction would involve grading, soil haul, utility trenching, etc. The grading strategy for the Proposed Project would be designed to closely balance the tiered grades of the existing topography, accommodate the needs of the proposed building program, and provide improved circulation and ADA access throughout the Project Site. Grading would occur throughout the Project Site with excavation depths ranging from 36 feet below ground surface to 0 feet below ground surface. Total earthwork at the Project Site would include up to approximately 182,500 cubic yards (CY) of cut and 149,900 CY of fill, with 44,000 CY of export.[3]

During demolition and construction, vehicles, equipment, and materials would be staged and stored within the Project Site. Typical construction equipment to be used could include backhoes, excavators, concrete saws, graders, dozers, scrapers, water trucks, forklifts, crane, loaders, aerial lifts, generators, welders, rollers, pavers, and air compressors. Use of a pile driver is assumed. The construction site and staging areas would be clearly marked, and construction fencing would be installed to prevent disturbance and safety hazards. Parking facilities for all construction workers would be identified prior to the demolition, grading, and construction phases, and are assumed to be internal to the Project Site.

2.4.9 Long-Term Operation and Maintenance Activities

Upon completion of each phase, long-term operation and maintenance responsibilities would be carried out to ensure the ongoing functionality of infrastructure, landscaping, open space, and public amenities. Maintenance activities would include routine inspections, repairs, replacements, landscape upkeep and replacement, and compliance with applicable stormwater and environmental regulations. Public safety, including private security and security monitoring features (e.g., cameras, security lighting, active patrols, etc.), would also be enhanced and implemented through long-term operation and maintenance.

[3] The 44,000 CY of export accounts for bulking factor and contingency.

Figure 2-6 - Buildings and Features to be Demolished



Source: Nearmap 2025.

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2.5 COMPARISON TO THE 2014 MASTER PLAN

The 2014 Master Plan functioned as a County medical facilities-focused document that guided modernization of the operational Medical Center, with land uses centered on inpatient and outpatient medical services, hospital support functions, and other institutional healthcare activities. The 2014 Master Plan focused on improving medical service delivery, internal circulation, and the long-term functionality of the County's Medical Center. In contrast, the Proposed Project proposes a comprehensive, community-oriented vision for the Campus that extends beyond institutional healthcare uses.

The Proposed Project (new Master Plan) introduces a diversified land use program that provides for a balance of housing and jobs and includes residential development, commercial and office uses, community-serving commercial uses, educational facilities, adaptive reuse of the historic General Hospital Building, and a connected network of public open spaces. These expanded land use types and development intensities were not contemplated under the 2014 Master Plan and introduce new environmental considerations, including, but not limited to, population and housing growth, public service demands, and transportation changes.

For reference, the previously approved 2014 Master Plan EIR, as modified by subsequent addenda, evaluated approximately 1,227,412 square feet of total new development. The Proposed Project would result in approximately 6,833,566 square feet of development beyond what was identified in the 2014 Master Plan and EIR. This comparison is provided for informational purposes only; the net change in development between the 2014 Master Plan and the Proposed Project will not be used as the basis of the environmental analysis. Instead, the Draft SEIR evaluates the Proposed Project in its entirety relative to existing baseline conditions.

2.6 INTENDED USES OF THE EIR

State CEQA Guidelines Section 15124(d) requires an EIR to contain a statement briefly describing the intended uses of the EIR. This Draft SEIR evaluates potential environmental impacts associated with the implementation of the Proposed Project and provides information regarding short-term, long-term, direct, indirect, and cumulative environmental effects of the Proposed Project. This Draft SEIR also identifies feasible mitigation measures and/or alternatives that would minimize or eliminate potential significant impacts associated with the Proposed Project. Lead agencies are charged with the duty to substantially lessen or avoid significant environmental effects where feasible. Where a lead agency identifies unavoidable adverse environmental effects of a project, State CEQA Guidelines Section 15093 authorizes the agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable adverse environmental effects when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits

outweigh the unavoidable adverse environmental effects, these effects may be deemed acceptable by the agency and substantiated in a statement of overriding considerations.

The County of Los Angeles is the lead agency for the Proposed Project as the owner of the Project Site and has approval authority over the Proposed Project. The County is the lead agency tasked to certify the Final SEIR and approve the new proposed Master Plan. Although the County is the lead agency for the Proposed Project, certain utility providers and off-site agencies (i.e., City of Los Angeles) for related infrastructure improvements have approval authority as responsible agencies. There are no trustee agencies (e.g., Regents of the University of California, Department of Fish and Wildlife, State Lands Commission, and Department of Parks and Recreation).

2.6.1 Responsible Agencies

State CEQA Guidelines Section 21069 defines a "responsible agency" as a public agency, other than the lead agency, that has responsibility for carrying out or approving a project. When a public agency acts as a responsible agency for a project, the responsible agency shall have more limited authority than a lead agency. The responsible agency may require changes in a project to lessen or avoid only the effects, either direct or indirect, of that part of the project which the agency will be called on to carry out (CEQA Guidelines Section 15041).

The responsible agencies for the Proposed Project are identified in Table 2-4, *Anticipated Actions Required*.

Table 2-4 Anticipated Actions Required

Lead Agency	Primary Actions
County of Los Angeles	▪ Certification of the Draft SEIR and approval of the new Master Plan and associated permitted uses and development standards. ▪ Approval of amendments to all other relevant ordinances and actions as necessary to ensure consistency of regulations and implementation of the Proposed Project. ▪ Ground lease agreement(s). ▪ Funding-related actions pertaining to approvals ▪ Approval of community benefits agreement. ▪ Grading, excavation, foundation, and other building permits. ▪ Other permits and approvals as deemed necessary to implement the Project.
Responsible Agencies	**Actions for Future Activities**
State Water Resources Control Board	▪ National Pollutant Discharge Elimination System permit
California Office of Historic Preservation	▪ Approval of official listing of resources on the National Register of Historic Places (NRHP)
City of Los Angeles Department of Water and Power	▪ Approval of utility connections and potential removal of sewer and storm lines ▪ Approval of Water Supply Assessment
City of Los Angeles Department of Transportation	▪ Approval of off-site roadway improvements
City of Los Angeles Bureau of Sanitation	▪ Solid waste on-site processing and collection
Los Angeles County Metropolitan Transportation Authority (Metro)	▪ Related approvals for Mobility Hub

2.6.2 Required Permits and Approvals

This is a program Draft SEIR that examines the environmental impacts of the Proposed Project. This Draft SEIR also addresses various actions by the County of Los Angeles to approve and implement the Proposed Project. It is the intent of this Draft SEIR to evaluate the environmental impacts of the Proposed Project, thereby enabling the County of Los Angeles, other responsible agencies, and interested parties to make informed decisions with respect to the Proposed Project. The anticipated approvals required for the Proposed Project include but are not limited to those listed in Table 2-4, *Anticipated Actions Required*.

2.7 REFERENCES

Census Reporter. 2023. Profile Data. https://censusreporter.org/.

City of Los Angeles. 2020. City of Los Angeles VMT Calculator Documentation. Version 1.3. https://ladot.lacity.gov/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf.

3. ENVIRONMENTAL ANALYSIS

3.0.1 Introduction

This chapter examines the environmental setting of the Proposed Project, analyzes the effects of the Proposed Project and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental topic identified below.

The Proposed Project is analyzed for potential significant impacts in accordance with Appendix F, "Energy Conservation," and Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines. Environmental topics and their corresponding sections and abbreviations are:

3.1	Aesthetics (AES)	3.10	Land Use and Planning (LUP)
3.2	Air Quality (AIR)	3.11	Noise (NOI)
3.3	Biological Resources (BIO)	3.12	Population and Housing (POP)
3.4	Cultural Resources (CUL)	3.13	Public Services (PUB)
3.5	Energy (ENE)	3.14	Recreation (REC)
3.6	Geology and Soils (GEO)	3.15	Transportation (TRA)
3.7	Greenhouse Gas Emissions (GHG)	3.16	Tribal Cultural Resources (TCR)
3.8	Hazards and Hazardous Materials (HAZ)	3.17	Utilities and Service Systems (USS)
3.9	Hydrology and Water Quality (HYD)	3.18	Wildfire (WIL)

In addition, the analysis considers Effects Not Found to Be Significant (Agricultural and Forestry Resources and Mineral Resources) in Chapter 5, *Other CEQA Considerations,* of this Draft SEIR. Mandatory Findings of Significance is also included in Chapter 5, *Other CEQA Considerations,* of this Draft SEIR, as required under State CEQA Guidelines Section 15065, to determine whether the Proposed Project would have any significant effects on the environment that cannot be mitigated to a less-than-significant level.

3.0.2 Organization of Environmental Analysis

To assist the reader with comparing information between environmental issues, each topical section of this chapter is organized under the same major headings.

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.

- **Existing Conditions** describes the existing environmental conditions, describing baseline conditions against which the impacts of the Proposed Project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on Appendix G of the 2025 State CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis and provides an overview of the impact conclusions of the 2014 Master Plan EIR for comparative purposes.
- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the Proposed Project. Mitigation measures are included as necessary. The impact discussion is organized under headings that correspond to the significance criteria in the 2025 State CEQA Guidelines. Where a significant impact is identified, an impact statement is provided to convey the specific impact, and the level of significance without and with mitigation is provided.
- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified, and mitigation measures are included as necessary, using the same format provided for the project impact analysis.
- **Comparison to the 2014 Master Plan EIR Impact Analysis** provides a comparison to the impact methodology and conclusions of the 2014 Master Plan EIR for informational purposes.
- **References** are provided for information sources used in the development of the discussion.

3.0.3 Levels of Significance

The level of significance is identified for each impact in this Draft SEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the State CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

Impacts that are identified as significant or potentially significant are identified as follows after the analysis:

- **Impact (Environmental Topic Abbreviation)-#: Impact statement summary**

3.0.4 Evaluation Methodology

Under State CEQA Guidelines Section 15064, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency, based on substantial evidence in the record as a whole, including consideration of views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. Pursuant to State CEQA Guidelines Section 15064(b), the analysis in this Draft SEIR is based on scientific and factual data that have been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.

Baseline

Section 15125, Environmental Setting, of the State CEQA Guidelines requires an EIR to include a description of the physical environmental conditions of the project vicinity. These conditions typically constitute the baseline physical conditions by which the lead agency will determine whether impacts are significant. Pursuant to State CEQA Guidelines Section 15126.2, Consideration and Discussion of Significant Environmental Impacts, the environmental setting at the time the Notice of Preparation (NOP) was circulated or when the environmental review process was commenced typically constitutes baseline conditions for the environmental analysis. The NOP for this Proposed Project was circulated beginning September 26, 2025.

As a Subsequent EIR, this Draft SEIR is not required to consider a new existing conditions baseline (i.e., existing conditions at the time the Draft SEIR NOP is circulated) and may consider the previously approved Master Plan as analyzed in the 2014 Master Plan EIR as part of the "baseline" conditions for the SEIR. However, this Draft SEIR uses as the Baseline for the Proposed Project the existing setting at the time of issuance of the NOP for the Draft SEIR. In some cases, the environmental analysis in this Draft SEIR may evaluate future development and activities that were already analyzed in the 2014 Master Plan EIR. In doing so, this Draft SEIR provides a comprehensive, updated analysis of potential impacts as a result of future development on the Project Site under the Proposed Project. This approach is appropriate given that the Proposed Project provides an updated vision, development framework, and buildout projections, for the entire Project Site. Chapters 3.1 through 3.18 summarize the methodology and conclusions in the 2014 Master Plan EIR for comparative purposes against the analysis in this Draft SEIR.

The following sections summarize the existing setting for the Proposed Project. Additional details specific to each environmental topic are included throughout this Draft SEIR. This section also summarizes the existing setting as it compares to the previously approved development analyzed in the 2014 Master Plan EIR.

Main Campus

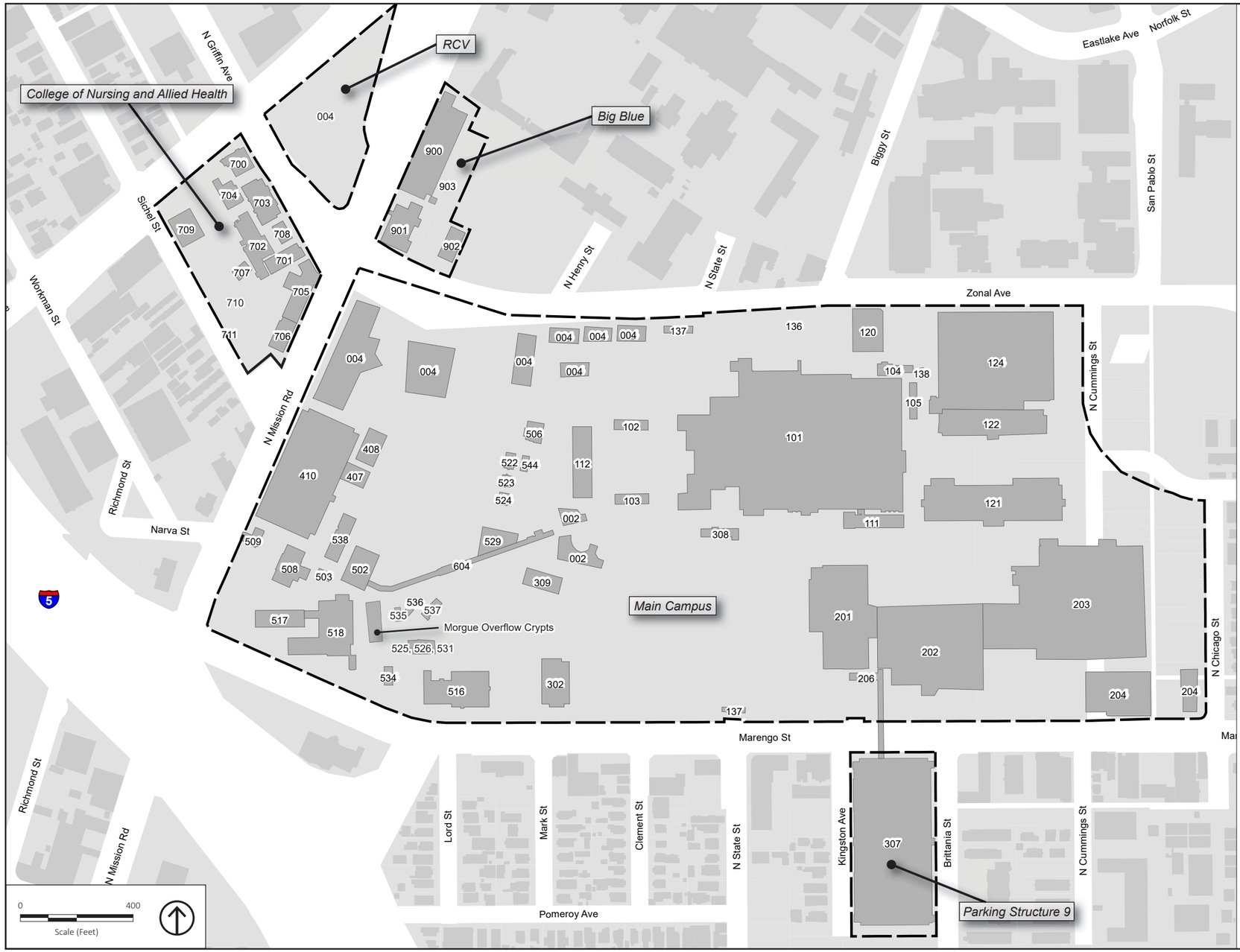
The approximately 71 acre "main campus" part of the Project Site is characterized by gently sloping to moderately sloping topography. The main campus is on a series of terraced and graded parcels. Ground elevations generally range from approximately 420 feet above mean sea level (msl) near the eastern part of the Project Site to approximately 320 feet above msl in the western part. The topography of the Project Site has been substantially modified by past grading to accommodate the Campus's existing uses, resulting in a largely developed site with limited natural features. Steeper slopes are in the north and east parts of the Project Site, and the southern and western parts are flat.

The Project Site provides bus, shuttle, and private auto access to the existing plaza at the General Hospital Building. State Street is the only street for vehicular traffic that crosses the main part of the Project Site. It also provides a drop-off area for patients and visitors when going to the Clinic Tower building.

Figure 3-1, *Campus Existing Configuration*, illustrates the locations and layouts of existing buildings on the Campus. The area east of State Street holds the majority of the active clinical (both inpatient and outpatient) services, including the Replacement Hospital (also known as the Los Angeles General Medical Center or Medical Center), West Central Plant, the Outpatient Department (OPD) building, and Clinic Tower (built in 2008). This area is the primary public-facing part of the Campus, representing the "front door" of the Campus to the community.

Also east of State Street are the Interns and Residents Dormitory building (IRD), currently used for hospital administration; several parking lots; and Parking Structure 12. However, the former General Hospital Building is the dominant building on this side of the Campus because of its height and presence on a crest within the Campus. The General Hospital Building, a historic resource eligible for listing on the National Register of Historic Places, was built in 1933 and operates as a Wellness Center on the 1st and 2nd floors and the surrounding gardens. The General Hospital was built with two administrative buildings, a gatehouse, and a utility tunnel and bridge. Several modular structures have been added at the historic entry plaza as well as north, east, and south of the General Hospital Building. See Chapter 3.4, *Cultural Resources*, for detail regarding historical development patterns and features.

Figure 3-1 - Campus Existing Configuration



Main Campus

002	Childcare Center
004	Restorative Care Village
101	Old General Hospital Building
104	Barracks D Building
105	Barracks G Building
111	Trailer 1 (east)/Trailer 3 (west)
112	Trailer 126
120	Mini-Warehouse Building (1900 Zonal Ave) (Supply Chain Operations Receiving)
121	Outpatient Building/Building B
122	Intern's & Resident's Dormitory Building
124	Parking Lot 12
136	Control House
137	Gate
138	Covered Trash Containers
201	Clinic Tower Building
202	Diagnostic & Treatment Building
203	Inpatient Tower
204	East Central Power Plant Building
206	Pedestrian Bridge
302	General Laboratories
308	Telephone Exchange Building
309	Trailer 17
407	Trailer 15 Los Angeles County Trailer (1240 N. Mission Rd)
408	Trailer 8 Los Angeles County Trailer (1240 N. Mission Rd)
410	Lot 10 Parking Structure (P-10) (1242 N. Mission Rd)
502	Pharmacy Building (1100 N. Mission Rd)
503	Shed 1 (Pharmacy Trailer)
506	Trash Compactor Building
508	Old Administration Building
509	Gatehouse/Angel Interfaith Network
516	West Coast Power Plant (1635 Marengo St)
517	Coroner's Administration Building
518	County of Los Angeles Department of Medical Examiner
522	OCS Annex I
523	OCS Annex II
524	OCS Annex III
525	Morgue Overflow Crypt
526	Morgue Overflow Crypt

Main Campus (continued)

529	Mason Shop (Tool Crib)
531	Morgue Overflow Crypt
534	Cooling Towers (1635 Marengo St)
535	Morgue Overflow Crypt
536	Tram Shop Storage & Pressure Washer Building
537	Tram Shop
538	Shed 2 (Pharmacy Trailer) (1100 N. Mission Rd)
544	OCS Storage
604	Historic Tunnel Building

College of Nursing and Allied Health

700	North Hall/Leonard Hill Hope Center
701	Tower Hall/Bldg 30/B
702	Library Building/Bldg C
703	Phinney Hall/Bldg 40
704	Science Building
705	Pediatrics Clinic/Bldg A
706	Pediatric Outpatient Building/Bldg 10/E
707	Building 120
708	T-60 Building/Bldg 60
709	Carlson Trailer/Bldg D
710	Parking Lot 14
711	Guard Shack

RCV

004	Restorative Care Village

Big Blue

900	Facilities Management Building
901	Rand Schrader Clinic/ LA General Medical Center Bldg C
902	BAART Programs Trailer
903	Utility Shack

Parking Structure 9

307	Parking Lot 9

Project Site Boundary

Source: ARG 2025.

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Most of the area west of State Street (sometimes referred to as the west campus) is considered to be underutilized, with a large amount of undeveloped space and significant topographic grade change that limits cohesive development and activity. The area west of State Street includes the County of Los Angeles Medical Examiner's facilities, on-grade and structural parking, and several support buildings. Many of these buildings are one-story modular buildings and not fully functional; therefore, several Campus programs are currently housed in temporary buildings or trailers. The western part of the main campus also holds the various phases of the Restorative Care Village (RCV). Recuperative Care Center and Crisis Residential Treatment Facility (RCV Phase I) are in operation and the Psychiatric Subacute Facility, Mental Health Urgent Care Center, and Residential Withdrawal Management Facility (RCV Phases IV and V) are currently being completed at the southwest corner of Mission Road and Zonal Avenue.

Improvements to the County of Los Angeles Medical Examiner building are currently being completed, including the replacement of 13 of the 14 unitized cold storage facilities with a new singular efficient prefabricated crypt building within approximately the same footprint. Additional improvements include a concrete foundation system, underground utilities for the new prefabricated crypt building, and seismic retrofits to the County of Los Angeles Medical Examiner administration building and adjacent building and maintenance repairs to the County of Los Angeles Medical Examiner building and parking lot.

Non-Contiguous Parcels

Directly across Mission Road from the main campus to the northwest, is a cluster of Spanish Colonial buildings that house facilities for administration, counseling, social work, facilities support, and clinical support. This area includes the College of Nursing and Allied Health as well as parking lot 14 (collectively referred to as the "College of Nursing and Allied Health" property). Across Mission Road, at the northeast corner of Mission Road and Zonal Avenue, a permanent supporting housing project (RCV Phase III), which is currently under construction. At the southeast corner of Mission Road and Zonal Avenue is Building C of the Los Angeles General Medical Center, formerly known as the Rand Schrader Clinic; the Carpenter's Mill building, known as "Big Blue;" and parking lot 6A (collectively referred to as the "Big Blue" property). The Medical Center buildings on the main campus are connected to Parking Structure 9—which is off the main campus on the opposite side of Marengo Street—by a pedestrian bridge that crosses Marengo Street.

The parcel on the northeast corner of Alhambra Avenue and Griffin Avenue is used for medical archive storage. It is also the site of parking lot 13. This parcel is not part of the Proposed Project and is thus not shown on Figure 3-1. An additional parcel between Valley Boulevard, Eastlake Avenue, and Alcazar Street is used as a storage and maintenance yard. This parcel is also not included as part of the Proposed Project and is thus not shown on Figure 3-1.

Comparison to 2014 Master Plan EIR Approved Conditions

At the time this Draft SEIR was prepared, several components of the development activities analyzed in the 2014 Master Plan EIR were completed or underway on-site. Specifically, demolition of the structures at the Women's and Children's Hospital site is complete, construction of RCV Phase I is complete, and construction of Phases III, IV, and V of the RCV is underway. The structures at the Women's and Children's Hospital site were demolished in 2021. In the western part of the main campus, the RCV Phase I was completed in April 2022, and the replacement childcare facility was completed in January 2023. Construction of the permanent supportive housing is underway at the non-contiguous parcel located at the northeast corner of Mission Road and Zonal Avenue (RCV). Construction of the Residential Withdrawal Management Facility, Mental Healthy Urgent Care, and Psychiatric Subacute Facility (RCV Phases IV and V) is underway at the former Women's and Children's Hospital site. The 2025 Addendum confirmed the structures that were identified for demolition in the 2014 Master Plan and included two new buildings for demolition (see Table 2-2, *Buildings to Be Demolished*). Table 3-1, *Summary of Approved Development and Demolition Square Footage*, identifies the square footage implemented to date.

Table 3-1 Summary of Approved Development and Demolition Square Footage

	Approved New Development Square Footage	Approved Demolition Square Footage
Total Approved	1,227,412[1]	1,217,801[3]
Total Implemented to Date	70,342[2]	390,000[3]
Total Remaining	**1,157,070**	**827,801**

[1] The 2014 Master Plan proposed 1,245,000 square feet of new development; the 2017 Project proposed a reduction of 127,000 square feet of Research and Development and a new 70,342 square foot Residential Care Facility, which would result in 1,188,342 square feet of new development; the 2023 Project proposed a reduction of 50,000 square feet of Administrative Office, a new 15,770 square foot medical office (land swap with Research and Development and Office Use), 115,420 square foot hospital addition (land swap with Research and Development and Office), and 17,880 square foot Residential Care Facility, which would result in 1,227,412 square feet of new development.

[2] Total square footage from implementation of Phase I of the Recuperative Care Village (RCV). Phases IV and V of the RCV are under construction.

[3] The 2014 Master Plan proposed the demolition of 1,092,763 square feet; the 2025 Project included additional buildings that increase the demolition square footage to 1,217,801 square feet.

[4] Total square footage from the demolition at the former Women's and Children's Hospital site (2014 Master Plan EIR component).

This demolition and new development were previously evaluated in the 2014 Master Plan EIR. However, to evaluate the Proposed Project and provide a comprehensive analysis of potential environmental effects resulting from implementation of the Proposed Project, this Draft SEIR

provides an updated evaluation of demolition of previously analyzed buildings, as well as the additional buildings that would be demolished under the Proposed Project.

Regulatory Setting

As the County of Los Angeles is the owner of the Project Site, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The Proposed Project remains subject to applicable federal and State laws, regulations, and policies. The Master Plan would guide the long-term phased redevelopment of parts of the Project Site, including adaptive reuse of the General Hospital Building. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City of Los Angeles' (City's) plans, policies, and regulations are provided for informational purposes only. Chapters 3.1 through 3.18 identify the policies and regulations of the City of Los Angeles that the County may consider when evaluating future development and activities that implement the Proposed Project.

Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The *CBIA vs. BAAQMD* ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions (certain housing projects and transportation priority projects pursuant to Public Resources Code (PRC) Sections 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC sec. 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC sec. 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the Proposed Project on the environment, including whether the Proposed Project may exacerbate any existing environmental hazards. Existing environmental hazards identified in the Northeast Los Angeles Community Plan area include, but are not limited to, seismic hazards, geological hazards, and wildfire hazards. Therefore, while the effects of these

hazards on the Proposed Project are generally not subject to CEQA review following the *CBIA vs. BAAQMD* case, a discussion of the project's potential to exacerbate these hazardous conditions is provided in Section 3.6, *Geology and Soils*, and Section 3.18, *Wildfire*, of this Draft SEIR.

3.0.5 Cumulative Impacts

A cumulative impact is created by the combination of the project evaluated in the EIR with other reasonably foreseeable projects causing related impacts. State CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to State CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

State CEQA Guidelines Section 15130(b)(1) states that the information used in the analysis of cumulative impacts should come from one or two sources:

A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this Draft SEIR use a combination of methods A and B. The cumulative discussions in Chapters 3.1 through 3.18 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional

emissions of criteria pollutants, and basin-wide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, however, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near the local area.

Cumulative projects within approximately one mile of the Project Site are described in Table 3-2, *List of Cumulative Projects*, and shown on Figure 3-2, *Cumulative Projects*. The approximate one-mile radius represents a reasonable distance within which similar projects or activities could contribute to overlapping environmental effects. However, the cumulative geographic study areas for each environmental topic can vary and are defined within each chapter of this Draft SEIR. Development within the Project Site (i.e., the recently completed RCV Phase I, ongoing improvements to structures on the Project Site, and ongoing construction of Phases II, III, IV, and V) is considered part of the environmental baseline.

Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
1.	The 2839 Prewett Project	2824–2839 N. Prewett Street	Phillip Wilson, Dennis Holmes, and Stanislav Troy	Seeking City Approvals	Approximately 1.0 mile	The project proposes to develop the 9,536-square-foot (0.22-acre) vacant lot with a new, two-story, 3,938-square-foot, single-family dwelling with an attached, two-car garage and an attached, 800-square-foot accessory dwelling unit with separate entry. The project would include two additional uncovered parking spaces at the rear yard; 2,913 square feet of landscaping, including low impact development stormwater infiltration planters; a 482-square-foot pool, and two retaining walls measuring up to six feet in height. The project would require 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading. No imported material would be required, and 645 cubic yards would be exported for disposal at an inert waste landfill.
2.	3880 Mission Project	3880 N Mission Road	Related Fund Management and Newland Capital Group	Seeking City Approvals	Approximately 1.0 mile	The project would involve the import of 344,000 cubic yards of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial, and office buildings (the remainder of the fill will come from on-

Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
						site sources). Any prior or subsequent development on the site is not a part of this project.
3.	Boyle Heights Community Plan Update	4,271 acres bounded by I-10 and Marengo Street to the north, Union Pacific Railway Lines to the south, Indiana Street to east, and Los Angeles River to the west	Los Angeles Department of City Planning	Adopted	Immediately southwest	This cumulative project presents a long-range planning effort. No specific development projects are included in it. The proposed plan includes amending both the text of the Boyle Heights Community Plan and the General Plan Land Use Map of the Boyle Heights Community Plan. The proposed plan would also adopt several zoning ordinances to implement the updates to the community plan, including adding new zoning districts and other zoning provisions to Chapter 1A of the New Zoning Code, as well as rezoning all parcels in the plan area to regulate specific uses and apply objective development standards (including height of structures, Floor Area Ratios [FAR], site configuration) using the New Zoning Code. Additional zoning ordinances include a Community Plan Implementation Overlay (CPIO) District, amendments to the River Improvement

Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
						Overlay (RIO) District and the Clean Up Green Up (CUGU) Overlay, and an amendment to the Adelante Eastside Redevelopment Plan, and related amendments to the General Plan, including the Framework Element and Mobility Plan necessary to implement the proposed plan.
4.	Estrella Azul	2201 E. 1st Street	A Community of Friends	Planning and Design	Approximately 1.0 mile	Four-story structure featuring 80 units and supportive services
5.	2330 E 3rd Street	2330 E 3rd Street	Terra Capital, LLC	Planning and Design	Approximately 1.1 miles	Four-story structure featuring 53 units
6.	443 S Soto Street	443 S Soto Street	East LA Community Corporation	Approved	Approximately 1.2 miles	140-unit affordable housing complex
7.	USC Discovery and Translation Hub	1590 North Eastlake Avenue; 1425-1501 North San Pablo Street; 1540-1580 East Alcazar Street	University of Southern California	Approved	Approximately 0.25 mile	Seven-story, nearly 144-foot-tall building featuring over 200,000 square feet of research space, including both wet and dry labs
8.	Chavez Garden	2518-2536 East Cesar E. Chavez Avenue	Los Angeles Housing Department	Planning and Design	Approximately 0.70 mile	110-unit affordable housing complex

Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
9.	2115-2125 East Cesar Chavez Avenue	2115-2125 East Cesar Chavez Avenue	Cesar Chavez 888, LLC	Under Review	Approximately 0.60 mile	Six-story mixed-use structure with 50 units
10.	Medical Examiner Crypt Expansion	1104 North Mission Road	County of Los Angeles Public Works	Approved	On-Site	The Medical Examiner Crypt Expansion Project will replace 13 of 14 existing cold storage facilities at the Medical Examiner Headquarters (1104 N. Mission Road) with a new 4,700 square foot prefabricated crypt building, along with a new concrete foundation and underground utilities. The structure will be located within approximately the same footprint as the existing temporary crypts, which is in the parking lot on the east side of building 1104A. The Board of Supervisors approved the project on August 5, 2025, and delegated authority to Public Works to advertise and award the construction contract via competitive low bid. The project was found categorically exempt from CEQA under Guidelines Sections 15302(b)/(c) and 15303(e), with a Notice of Exemption filed with the County Clerk on August 14, 2025. The project is currently in plan check, with construction

Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
						scheduled to begin in Summer 2026 with target completion at the end of 2026.
11.	Medical Examiner Seismic Retrofit	1104 North Mission Road	County of Los Angeles Department of Public Works	Planning and Design	On-Site	The project consists of seismic retrofits to the Medical Examiner administration building (1102) and the adjacent 1104A building, managed by the Department of Public Works. All work is planned to be completed from the exterior of both buildings to maintain uninterrupted ME operations throughout construction.
12.	Medical Examiner Deferred Maintenance Repair Project	1104 North Mission Road	County of Los Angeles Department of Public Works	Approved	On-Site	This project consists of deferred maintenance repairs (HVAC and electrical) to Medical Examiner building 1104A building and to an adjacent parking lot. The parking lot component is currently in design, with design expected to be completed in September 2026. Construction is expected to begin in November 2026 and be completed in August 2027 (two phases, nine months total). The HVAC and electrical repairs are undergoing a Value Engineering (VE) study to establish prioritized scope within the available budget; VE is expected to be completed in August 2026. This project was approved by the Board of Supervisors via a Facility Reinvestment Program Board

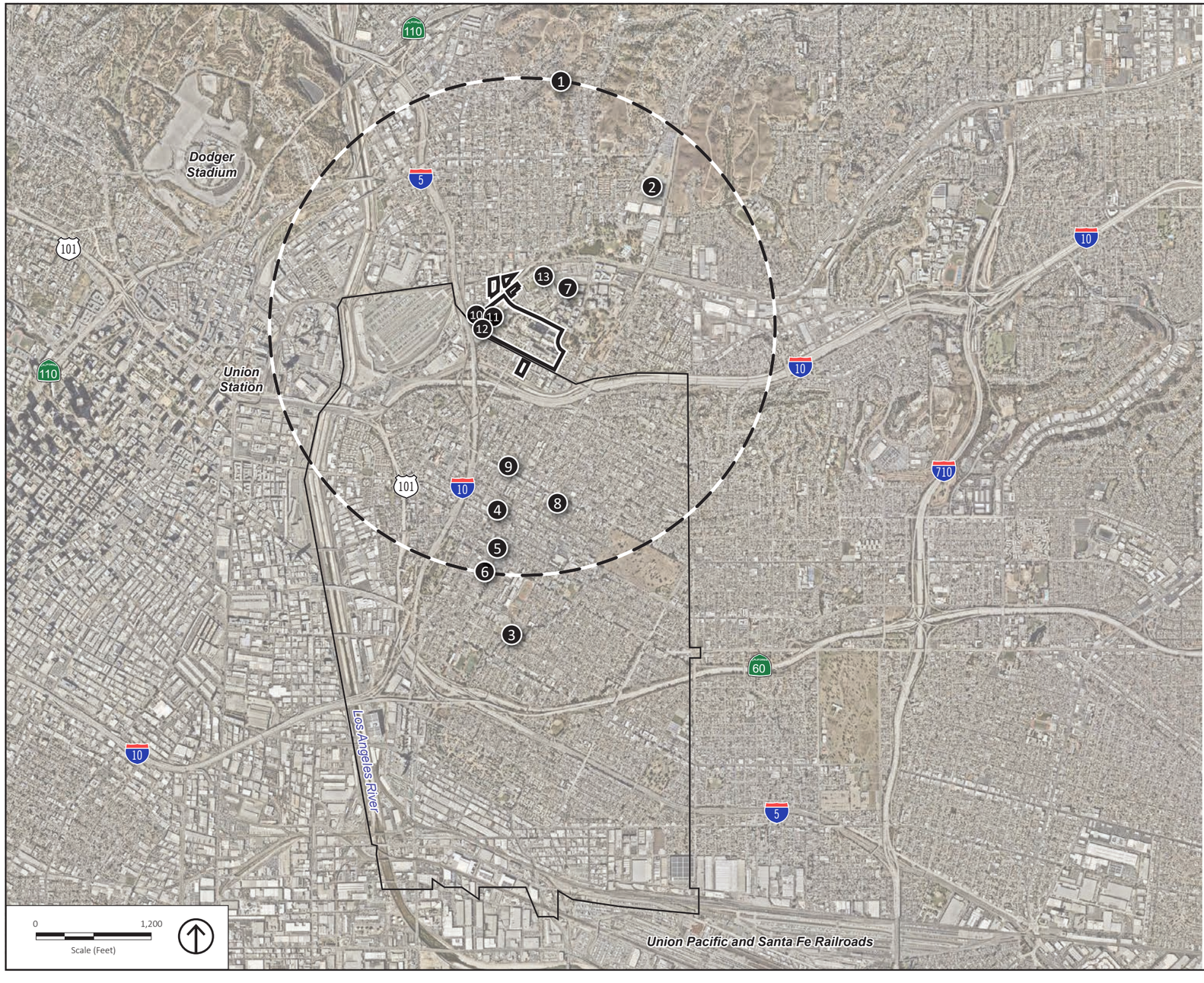
Table 3-2 List of Cumulative Projects

Number	Project Name	Location	Project Proponent	Status	Distance to Project Site	Description of Project
						letter dated May 28, 2019. The project has been determined to be categorically exempt from CEQA.
13.	RCV Surface Parking Lot	1605 Eastlake Avenue	County of Los Angeles Department of Public Works	Planning and Design	Approximately 0.23 mile	The surface parking lot will require the demolition of three existing structures at the site. The lot will serve exclusively as support infrastructure for RCV Phases IV and V.

Source: City of Los Angeles, 2025 (https://planning.lacity.gov/); County of Los Angeles (Personal Communication, 2026)

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Figure 3-2 - Cumulative Projects



Project Site Boundary

1-Mile Radius from Project Site Boundary

Parks and Recreation Facilities

1. The 2839 Prewett Project
2. 3880 Mission Project
3. Boyle Heights Community Plan Update
4. Estrella Azul
5. 2330 E. 3rd St.
6. 443 S. Soto St.
7. USC Discovery and Translation Hub
8. Chavez Garden
9. 2115-2125 East Cesar Chavez Ave.
10. Medical Examiner Crypt Expansion
11. Medical Examiner Seismic Retrofit
12. Medical Examiner Deferred Maintenance Repair Project
13. RCV Surface Parking Lot

Source: Nearmap 2025.

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3.1 AESTHETICS

This chapter of the Draft SEIR discusses the potential impacts related to aesthetics from the implementation of the Proposed Project. As discussed in Section 3.1.5, of this chapter, the Proposed Project meets the criteria of Public Resources Code Section 21099(d)(1), and aesthetic impacts shall not be considered significant impacts on the environment. However, the Draft SEIR includes an evaluation of aesthetics for informational purposes only, to provide a complete record of the Proposed Project's visual context (including shade and shadow), demonstrate consistency with applicable design standards and policies, and inform the public about potential visual changes related to building height, massing, and site improvements. This chapter also describes the Project Site's visual setting and identifies applicable regulatory requirements.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, no comments were received regarding aesthetic impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*.

3.1.1 Regulatory Framework

As County of Los Angeles is the owner of the Project Site and the public agency involved in development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

National Scenic Byways Program

The National Scenic Byways Program is part of the United States (U.S.) Department of Transportation, Federal Highway Administration. Established in Title 23, Section 162 of the United States Code under the Intermodal Surface Transportation Efficiency Act of 1991 and reauthorized and expanded significantly in 1998 under Transportation Equity Act (TEA)-21 and again under Safe Accountable Flexible Efficient Transportation Equity Act-A Legacy for Users (SAFETEA-LU) in 2005, the program is a grass-roots collaborative effort established to help recognize, preserve and enhance selected roads throughout the United States (Caltrans 2026a).

On September 22, 2019, the Reviving America's Scenic Byways Act of 2019 was signed by the President and became Public Law 116-57. This law requires the U.S. Secretary of Transportation to solicit nominations for certain roads to be designated under the National Scenic Byways Program as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities (Caltrans 2026a).

The Consolidated Appropriations Act, 2021 (Public Law 116-260), enacted on December 27, 2020, appropriated $16 million for the National Scenic Byways Program under section 162 of title 23, United States Code. The explanatory statement accompanying the Consolidated Appropriations Act, 2021 stated that Federal Highway Administration (FHWA) should make new designations under the scenic byways program, as required by the Reviving America's Scenic Byways Act of 2019 (Public Law 116-57), prior to issuing a notice of funding opportunity (NOFO) for the scenic byways program. FHWA announced the 2021 Designations to America's Byways on February 16, 2021 (Caltrans 2026a).

STATE

California Scenic Highway Program

The California Department of Transportation (Caltrans) established and implemented the California Scenic Highway Program to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment (Streets and Highways Code Section 260 et seq.).

Caltrans defines a State Scenic Highway as any freeway, highway, road, and other public right-of-way that “traverses an area of outstanding scenic quality, containing striking views, flora, geology, and other unique natural attributes.” Once a highway has been designated a State scenic highway, or a scenic corridor, special consideration must be made whenever a project proposes to develop the surrounding area (Caltrans 2026b).

California Building Code

The California Building Code (CBC), Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code. The CBC includes standards for outdoor lighting that are intended to improve energy efficiency, and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

LOCAL

As the County of Los Angeles is the owner of the Project Site, the Proposed Project is not subject to the City of Los Angeles’ planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding

the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

County of Los Angeles Building Code

The most current version of the County of Los Angeles Building Code (Title 26 of the Los Angeles County Code) is the county's locally amended adoption of the 2022 California Building Code (part of Title 24 of the California Building Standards Code), establishing minimum standards for the design, construction, alteration, repair, and maintenance of buildings and structures to protect health, safety, and welfare throughout the unincorporated areas and participating cities (County of Los Angeles 2023).

County of Los Angeles General Plan 2035

The Conservation and Natural Resources Element of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) (County of Los Angeles 2015) provides goals and policies relevant to aesthetic resources. Applicable policies from the Conservation and Natural Resources Element include the following.

Goal C/NR 13: Protected visual and scenic resources.

- **Policy C/NR 13.1.** Protect scenic resources through land use regulations that mitigate development impacts.
- **Policy C/NR 13.3.** Reduce light trespass, light pollution and other threats to scenic resources.
- **Policy C/NR 13.4.** Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
- **Policy C/NR 13.5.** Encourage required grading to be compatible with the existing terrain.

County of Los Angeles Code of Ordinances

Title 22 of the Los Angeles Code of Ordinances establishes land use, development, and design standards that guide the aesthetic character of development within unincorporated Los Angeles County. Although the Project Site is located within the jurisdictional boundaries of the City of Los Angeles, it is owned and operated by the County of Los Angeles. Accordingly, select provisions of Title 22 are referenced for informational and comparative purposes to provide context regarding commonly applied County design and aesthetic standards. Title 22 includes regulations governing building form, height, setbacks, landscaping, and signage, as well as design provisions within Community Standards Districts (CSDs) and other special zones intended to preserve or enhance local visual character. The ordinance also implements the County's "Public Art in Private Development" program, which promotes integration of public art and high-quality design in new development. Compliance with applicable provisions of Title 22

ensures that County-reviewed projects maintain a visually compatible and cohesive built environment consistent with the County's planning and design objectives (County of Los Angeles 2025).

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) is composed of elements covering various aspects of the urban environment. The City's General Plan has 11 citywide elements and 34 Community Plans that make up the Land Use Element. The Project Site is in the Northeast Los Angeles Community Plan area; the Northeast Los Angeles Community Plan is discussed below. The Framework Element is the General Plan's organizing element and connects all the elements. The Urban Form and Neighborhood Design chapter of the Framework Element provides goals addressing urban design (City of Los Angeles 1995). The following are applicable goals, objectives, and policies from the Framework Element related to aesthetics.

Goal 5A: A livable city for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.

- **Policy 5.2.2.** Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.

- **Objective 5.5:** Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

The applicable goal from the Open Space Element of the General Plan (City of Los Angeles 1973) include:

Goal: To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public.

The applicable policy from the Conservation Element of the General Plan (City of Los Angeles 2001) include:

- **Policy.** Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan area encompasses the hills and valleys east of the Los Angeles River and north of the Boyle Heights Community Plan area in the City. The 15,000-acre area, with roughly 250,000 inhabitants in a diverse collection of communities and neighborhoods, serves as a transition area between the downtown center of the City of Los Angeles and the neighboring cities of Glendale, Pasadena, South Pasadena, and Alhambra to the north and east. The general purpose of the Northeast Los Angeles Community Plan is to preserve and enhance the character of the Community Plan area by strengthening the viability and identity of its neighborhoods and communities and improving the quality of life for all its residents. Applicable policies from the Northwest Los Angeles Community Plan (City of Los Angeles 1999) include:

- **Policy 1-3.2.** Consider factors, such as neighborhood character and aesthetics, identity; compatibility of land uses; impacts on livability, services, public facilities, and traffic levels, when changes in residential densities are proposed.
- **Policy 14-2.1.** Encourage the preservation, maintenance, enhancement and adaptive reuse of existing buildings in commercial areas through the restoration of original facades and the design of new construction which complements the old in a harmonious fashion, enhancing the historic pattern.

City of Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. In particular, Chapter 1 of the LAMC, General Provisions and Zoning, provides development standards for the various zoning districts in the City of Los Angeles. The LAMC also sets forth the following specific regulations regarding lighting:

- Chapter 1, Article 2, Section 12.21 General Provisions, paragraph A, Section 5, Part (k), restricts light spill onto adjacent properties and provides minimum luminance levels for safety within and around parking facilities.
- Chapter 4, Section 93.0117, Outdoor Lighting Affecting Residential Property, establishes requirements for outdoor lighting affecting residential properties by limiting light trespass, requiring fixtures to be shielded and directed downward, and sets an illumination threshold of two foot-candles at residential property lines.

As part of the LAMC, the City of Los Angeles Planning and Zoning Code includes standards for different land uses and identifies which land uses are allowed in various zoning districts. The Project Site has a City of Los Angeles zoning designation of Public Facilities, Height District 1 (PF-1) (ZIMAS 2026). The PF zoning district allows public health facilities, including clinics and

hospitals. PF-1 zoning does not have restrictions regarding the heights of buildings or any specific front-, side-, or rear-yard setbacks (LAMC Section 12.04.09).

City of Los Angeles Walkability Checklist

The 2008 Walkability Checklist for Entitlement Review was developed by the City Planning Department's Urban Design Studio to encourage city planning staff, project proponents, and community stakeholders to pursue high quality urban design that provides enhanced pedestrian movement, access, comfort, and safety, both in the public right-of-way and on private properties. It specifies urban design guidelines that are generally applicable to all projects requiring discretionary approval by the City for new construction. The Walkability Checklist consists of objectives, goals, and implementation strategies regarding various design elements that are intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form.

Such topics as sidewalks, crosswalks/street crossings, on-street parking, utilities, building orientation, off-street parking and driveways, on-site landscaping, building façades, building signage, and lighting are addressed and should be considered in the design of a project (City of Los Angeles 2008).

3.1.2 Existing Conditions

As shown on Figure 3-1, *Campus Existing Configuration*, and *Figure 3.1-1, Aerial Photographs of the General Hospital Building*, the entirety of the Project Site is developed with buildings and structures that make up and support the Los Angeles General Medical Center. Specifically, the Project Site includes medical and office uses, parking facilities, and maintenance facilities to support the continued operation of these critical community-serving uses.

LANDFORMS, LANDSCAPE, AND TOPOGRAPHIC CHARACTER

The Project Site occupies a range of flat to rolling and hilly terrain, with steep slopes that visually separate the east and west parts of the Project Site. The landscape and open spaces on the Project Site consist largely of a fragmented collection of underutilized areas framed by the existing building layout and natural topography. The majority of the Project Site is comprised of built structures and paved areas. Landscaped areas are limited in size, isolated, and generally not designed as integrated or continuous open space. The use of inconsistent landscaping, non-native plantings, and dispersed amenities contribute to a lack of cohesion. Open spaces that provide more expansive views of the Project Site are at the historic General Hospital forecourt and adjacent terrace areas. In high-traffic areas, including the drop-off zones at the clinical tower, inpatient tower, and outpatient courtyard, vehicular circulation is the primary influence on the areas' visual character due to concrete sidewalks, paved parking lots, driveways, and access roads.

SCENIC VISTAS AND VISUAL RESOURCES WITHIN A SCENIC HIGHWAY

A scenic vista is a public view from a location that is publicly accessible or composite views along a public roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or entirely of developed areas, such as a scenic vista of a rural town and surrounding agricultural lands or a city's skyline. As used herein, a "scenic vista" is defined as a publicly accessible view of a broad, expansive landscape or other unique unusual features (i.e., scenic resources) that has been deemed significant or valuable by the community. The unique unusual features must make up an important or dominant portion of the viewshed.

Scenic vistas are often associated with designated scenic overlooks or other elevated vista points. The area surrounding the Project Site occupies a range of flat to rolling and hilly terrain; the terrain ranges from approximately 320 feet above mean sea level (msl) in the west to approximately 440 feet above msl in the northeast where the Project Site borders Cornwell Street. The Project Site contains a 40-foot grade difference between the elevated General Hospital Building area and the lower western portion of the main campus. Due to this topographic variation, views of portions of the Project Site are available from a number of vantage points in the nearby Boyle Heights neighborhood. Similarly, from higher elevations and upper stories of taller buildings on the Project Site, informal (i.e., not officially designated) off-site views are possible. The 2014 Master Plan EIR did not identify any recognized scenic vistas within the Project viewshed, nor do any local planning documents.

Scenic resources are generally considered to include public places recognized for their scenic quality or deserving protection from adverse visual change or visual impacts to users enjoying their visual quality. They are designated or otherwise recognized by a public authority (federal, state, or local) or visual quality experts for their scenic qualities. While there is no comprehensive list of specific features that automatically qualify as scenic resources, certain characteristics can be identified which contribute to the determination of a scenic resource. This includes but is not limited to historic buildings, landmark or distinctive trees, or unique rock formations (Caltrans 2026c). The historic General Hospital Building is the dominant visible feature on the Campus and is a defining visual landmark that features an Art Deco façade and stands at 19 stories. The General Hospital Building can be seen from many locations in Los Angeles, from Elysian Park, downtown Los Angeles, and at certain locations from all local traversing freeways. Additionally, the Old Administration Building, Pharmacy Building, and the Tunnel/Viaduct are some of the oldest elements of the Campus and have a distinct visual appearance, though are smaller in scale than the General Hospital Building and visible only from the immediate vicinity. While the General Hospital and Old Administration buildings (both considered historic resources pursuant to CEQA as described in detail in Chapter 3.4, *Cultural Resources*) are not formally recognized as scenic resources in local planning documents, for purposes of this Draft SEIR, they are considered scenic resources.

There are several key viewsheds within and near the Project Site. The Marengo Boulevard entry at State Street establishes the primary procession into the Campus and frames the approach to the Forecourt, reinforcing the General Hospital Building's stature and civic presence. The view centrally from Mission Street, near the proposed Commerce Plaza, aligns with the monumental historic axis and central spine, offering a clear reading of the General Hospital Building's symmetry and heart of the Campus. From the Zonal Avenue entry, views of the stepped façade convey the scale and layered composition of the General Hospital Building as it rises above the surrounding terrain.

East- and west-facing views across the landscape from the edge of the Project Site typically end at the horizon line where the terrain meets the skyline, or are blocked by existing trees and buildings. Informal views of portions of the Downtown Los Angeles skyline are visible facing west and southwest from the edge of the Project Site along Marengo Street at State Street and particularly in areas of higher elevation, or from elevated stories in the General Hospital Building. Direct north-facing views within the center of the Project Site, or from its southern borders, are largely framed or blocked by Campus medical buildings, the office towers of the University of Southern California Health Sciences Campus (USC HSC), and trees. The northwest-facing views include the taller forms of the Elysian Hills, with the San Gabriel Mountains ridgelines in the distance to the north. These views are not considered scenic vistas as they are distant, intermittently visible through urban development, and are not part of a designated scenic corridor or a continuous panoramic view. Hillside colors include gray-green chaparral and woodland, seasonal grassland that shifts from bright green to tan in summer and fall, and the more consistently green evergreen trees and irrigated landscaping associated with foothill residences. The Northeast Los Angeles Community Plan identifies Mount Washington, the San Gabriel Mountains, and the Eagle Rock as views that are major attributes to the community (City of Los Angeles 1999). However, these attributes do not make up a dominant portion of the viewshed as views of these attributes are heavily obstructed from the Project Site and surrounding area due to intervening development. Therefore, no recognized scenic vistas are identified within the viewshed of the Project Site; informal and intermittent views of the General Hospital Building, downtown skyline, and local foothills and mountain ridgelines are available from the surrounding public viewsheds.

State Scenic Highways are recognized under the California Streets and Highways Code. The California Department of Transportation (Caltrans) administers the California Scenic Highway Program, intended to protect and enhance California's natural scenic beauty, as well as safeguard the social and economic values provided by the State's highways (Caltrans 2025). The nearest officially designated State Scenic highway to the Project Site is State Route (SR)- 2 located approximately 12 miles northeast (Caltrans 2026d). The Project Site is not within a viewshed of a State Scenic Highway. It should be noted that a portion of the SR-110 freeway (Arroyo Seco Historic Parkway Scenic Byway), between US-101 and E Colorado Boulevard in the City of Pasadena, is identified by Caltrans as an official Federal Byway (Caltrans 2025) but is not a designated State Scenic Highway. A Federal Byway, such as the Arroyo Seco Historic Parkway

Scenic Byway, is federally designated for its intrinsic qualities, but this designation does not automatically make it a California State Scenic Highway, which requires a separate state-level designation and local corridor protection (FHWA 2025). The Arroyo Seco Historic Parkway Scenic Byway is approximately 1.46 miles northwest of the Project Site. Due to the distance, topography, and intervening development, only the top portions of the General Hospital Building are visible from a limited segment of the southbound lanes of the Arroyo Seco Historic Parkway Scenic Byway. The Arroyo Seco Historic Parkway Scenic Byway is not visible from the Project Site.

SCENIC CHARACTER AND QUALITY

Surrounding Area

The Project Site is located in an urbanized and densely developed area of the City of Los Angeles. As shown in Figure 2-3, *Local Vicinity*, the Campus is surrounded by variety of uses, including public uses, residential, commercial, industrial, medical, and institutional uses. The surrounding area is transected by two major freeways: Interstate (I-) 5 to the west and I-10 to the south. The I-10 has a partially below-grade (depressed) configuration and is not visible from the Project Site, whereas I-5, has an elevated configuration at Marengo Street/Mission Road as it nears the interchange with I-10 farther south, and is visible from the Project Site.

The character of physical development in the vicinity of the Project Site is shaped by the proximity of the Los Angeles River, topographic variation, and transportation infrastructure. Three closely adjoining railroad alignments are present in the surrounding area's visual setting: the Union Pacific Railroad (UPRR) to the north along Valley Boulevard (adjacent to the Project Site to the north and the Burlington Northern Santa Fe (BNSF) line, which follows the I-10 on the north side in an east-west direction (approximately 1,500 feet away). The Los Angeles River is about 0.7 miles west of the Project Site, flanked on both sides by industrial development and railroad uses. The low-lying areas of Boyle Heights, collectively known as "The Flats," adjacent to the river contain flat terrain with a dense concentration of light and heavy industrial buildings, warehouses, and transportation-related infrastructure. Industrial uses extend eastward from the river to Mission Road, which functions as a visual boundary along the western portion of the Project Site for heavy industrial operations such as auto wrecking yards, truck yards, factories, metal plating facilities, and automotive repair shops in the adjacent flatlands bordering the river. Non-cohesive streetscape features and low-rise, utilitarian buildings of stucco or brick construction dominate the major streets adjoining the Project Site.

Project Site

Within the Project Site, development spans a wide range of periods, from the early twentieth century to more recent construction from the 1970s onward. Details about the historical significance of the Project Site and its features can be found in Chapter 3.4, *Cultural Resources*. The General Hospital Building was originally completed in 1933 and contains 19 above-grade

levels of former medical uses and 1.2 million square feet of developed space. The building is eligible for listing on the National Register of Historic Places (NRHP), and the County is currently undertaking the process to formally list the building on the NRHP. The General Hospital Building is listed on the California Register of Historical Resources (CRHR) and is included in the Built Environment Resource Directory (BERD) for Los Angeles County.

With the exception of the distinctive visually unified landscape, hardscape, and architectural elements designed in conjunction with the General Hospital Building during the 1930s, design treatments, as measured by the choice of architectural style, building form/siting, and the design of parking areas, vary widely; they appear to be typical of regional-scale medical facilities found across the Southern California region and are not distinctive and/or unique to the Campus setting in the community. By contrast, the General Hospital Building and related landscape, hardscape, and architectural features (concrete terrace walls, gate posts, perimeter walls, wrought iron, entry guard stations, ornamental trees, shrubbery, and grass turf areas) have a highly unified, visually distinctive, and vivid design character. Due to its massing, scale, height, and location atop high terrain, the General Hospital Building is one of the community's primary visual landmarks (see Figure 3.1-1, *Aerial Photographs of the General Hospital Building*) —one that can be readily seen in many north- and northeast-facing views from the east, south, and southwest.

The County Medical Examiner's facilities, on-grade and structural parking, and large open areas with a number of support buildings are visible within the western portion of the main campus. Many of the buildings within the western portion of the main campus are one-story modular buildings and in poor physical condition that do not contribute to visual quality of the main campus or effectively support operation. Some buildings are not fully functional; therefore, several Campus programs are currently being housed in temporary buildings or trailers. Outdoor storage areas for equipment and construction staging areas (for the Restorative Care Village [RCV] currently in construction) are also present. These elements of the western portion of the campus are at a lower elevation than and downslope of General Hospital Building, and are not generally visible from areas off of the Project Site. Overall, the visual setting of the main campus is marked by abrupt changes in design character and in uses.

There is a sharp visual divide between Campus built features, landscape components, and the surrounding neighborhood design element. Mission Road features a mix of light industrial uses (such as automotive repair and manufacturing), gas stations, and medical offices associated with the Campus, resulting in a varied design character. Zonal Avenue forms the northern boundary of the main campus and separates the main campus from the USC Health Sciences Campus (HSC). Compared to Mission Road and Marengo Street, Zonal Avenue has a quieter character, shaped by its rolling topography, mature parkway trees, and a mix of hospital and non-healthcare-related uses that are more uniform in their design character and structural design. The main campus boundary along Zonal Avenue is clearly defined by parking structures, topography, perimeter walls and fencing, and landscaped features.

Figure 3.1-1 - Aerial Photographs of the General Hospital Building







Source: RIOS 2025.

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Sensitive Viewer Groups

Individuals within the viewshed of the Project Site include thousands of residents who reside in both single-family and low-rise multi-family residential buildings of varying densities on the streets adjoining the Project Site south of Marengo Street and east of Chicago Street, commuting motorists, pedestrians, and campus staff and visitors. These viewer sub-groups and their relative sensitivity is described below:

- **Residents** who reside in residences on streets adjoining the Project Site, employees, clients, students, and visitors at the Project Site, adjacent USC University Hospital, and other neighborhood businesses experience a moderate to high level of sensitivity to changes in the visual setting due to their prolonged time on the Project Site or immediate vicinity.
- **Commuters** on the adjoining I-5 and I-10 freeways and local streets that offer fleeting views of the taller buildings on the Project Site experience a low level of sensitivity to changes in the visual setting due to the fleeting duration of visibility and highly urbanized surrounding conditions.
- **Students** traveling to and from Francisco Bravo Medical Magnet High School (located approximately 650 feet east of the Project Site) experience a low to moderate level of sensitivity to changes in the visual setting given proximity to the Project Site (repeated visible exposure) and varied modes of travel.
- **Bicyclists** along the bike route that borders a portion of the Project Site on Griffin Avenue experience a moderate to high level of sensitivity to changes in the visual setting because they are presumed to choose bicycle routes based, in part, on aesthetic considerations and because of the more prolonged duration of visibility.

LIGHT/GLARE AND SHADE/SHADOW

“Light” refers to artificial light sources associated with the built environment, including streetlights, building lights, parking lot lights, security lights, and other sources. These light sources can contribute to “light pollution,” which can impair views of the night sky and create other environmental impacts. Poorly shielded or otherwise misdirected light sources can also result in “light spill,” which refers to the unwanted transmission of light onto adjacent areas that may affect sensitive receptors, such as residential properties or wildlife habitat.

“Glare” is created by lights that are particularly bright or poorly shielded as well as surfaces that reflect sunlight or artificial light, creating glare. Sources of glare may include reflective building materials, exterior lighting at commercial buildings and other structures (e.g., porch lights, landscape lighting, security lighting), vehicle headlights, and street lighting. Existing on-site sources of glare may include reflective building materials, exterior lighting, and vehicle headlights.

The Project Site is fully developed with buildings and structures, including current construction activities, that compose and support the Medical Center. Existing on-site sources of artificial light include light emanating from building interiors and outdoor buildings, security, sidewalk, and parking lot lights. Decorative uplighting illuminates the exterior of the General Hospital Building nightly. The existing lighting and glare conditions on the Project Site do not expose nearby sensitive receptors to excessive light or glare as the Project Site is within a highly urbanized area of the City of Los Angeles and is surrounded by numerous sources of artificial light and glare. Existing off-site lighting sources include street lighting, vehicular lighting, and exterior lighting on existing commercial, industrial, and residential uses. The nearest light and glare sensitive receptors are the residences south of the Project Site, across Marengo Street.

Observed effects of extended periods of shade and shadow are dependent on the height and type of features that may cast shadows, seasonal changes (equinoxes), the time of day, and the type of receptors. Shade/shadow is currently associated with existing development on the Project Site. While increased shade is often considered a positive feature in areas of prolonged heat, groups considered sensitive to extended periods of shade/shadow include routinely useable outdoor spaces associated with residential or institutional land uses; commercial uses, such as pedestrian-oriented outdoor areas or restaurants with outdoor eating areas; nurseries; existing solar collectors; and recreational areas, such as parks. There are no shade/shadow sensitive receptors on or in the immediate vicinity of the Project Site.

3.1.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines, Section I, states that, "except as provided in Public Resources Code Section 21099," the proposed project would result in a significant aesthetic impact if it would:

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

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

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

d) Expose people on- or off-site to substantial light or glare, which would adversely affect day or nighttime views in the area, or result in substantial shadow impacts on shadow-sensitive land uses.

METHODOLOGY

In 2013, the State of California enacted Senate Bill 743 (SB 743), which made several changes to CEQA for projects located in areas served by transit. Specifically, Public Resources Code Section 21099(d)(1) provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Projects meeting these criteria, as defined below, are not considered to have a "significant impact" on the environment:

- Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”
- Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.”
- Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- Public Resources Code Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio [FAR] of no less than 0.75 and that is located in a TPA.

The Project Site is located within a one-half mile radius of the Los Angeles General Medical Center station for the Metro J Line (910/950). The Metro J Line qualifies as a high-quality transit corridor (HQTC), as it provides service intervals no longer than 15 minutes during peak commute hours, and is noted as an HQTC in SCAG's "High-Quality Transit Corridors Interactive Map” (Metro 2024, SCAG 2025). Additionally, the Project is located within two types of Priority Development Areas (PDAs) as defined in the 2024 SCAG RTP/SCS: Transit Priority Areas (TPAs) and Livable Corridors (LCs). PDAs are defined in the 2024 RTP/SCS as areas within the SCAG region where future growth can be located to help the region reach RTP/SCS goals. Therefore, the Project Site is located within a defined TPA and is within one-half mile of a major transit stop.

The Project Site is in an entirely developed and urbanized part of Los Angeles and has been developed with uses for decades. It is surrounded entirely by urban uses. Therefore, the Project Site is considered an infill site.

The Proposed Project would allow for the development of over 8 million square feet of new development with a variety of land use types, including residential uses as well as employment-serving uses (i.e., office, commercial/retail, patient and caregiver lodging, warehouse, clean tech/advanced industrial, and hospital uses) with an overall FAR greater than 0.75. Therefore, the Proposed Project is considered to be a mixed-use residential project and employment center project.

The Proposed Project meets the criteria of Public Resources Code Section 21099(d)(1) since it is a mixed-use residential and employment center project on an infill site within a transit priority area. Therefore, aesthetic impacts shall not be considered significant impacts on the environment. However, the Draft SEIR includes an evaluation of aesthetics for informational purposes only, to provide a complete record of the Proposed Project's visual context, to demonstrate consistency with applicable design standards and policies, and to informs the public about potential visual changes related to building height, massing, and site improvements.

The analysis of aesthetic impacts in this section is based on a review of existing site conditions; surrounding land uses; and identification of sensitive viewer groups in relation to changes that could result from development resulting from implementation of the Proposed Project The evaluation is consistent with CEQA and the State CEQA Guidelines and applicable County policies and is informed by industry standards for visual impact assessment, including considerations of viewer sensitivity, changes in visual quality, and compatibility with existing land uses. Impacts are assessed using established significance thresholds to determine whether the Proposed Project would substantially degrade the existing visual environment or affect scenic resources. The Project Site is in an urbanized area characterized by existing buildings, paved streets, and supporting infrastructure. Given this context, the urban standard is applied for evaluating aesthetics under CEQA and, therefore, consistency with applicable zoning and regulations governing scenic quality is described, for informational purposes.

The analysis evaluates the Proposed Project's potential to result in aesthetics impacts by examining the anticipated visual contrast between future development accommodated under the Proposed Project and the existing visual character of the Project Site and surrounding area. Although the Proposed Project does not include site-specific architectural plans, it establishes development standards and permitted uses that would govern future buildout of the Project Site. Accordingly, this analysis is based on reasonable assumptions derived from these standards including maximum allowable building heights, densities, floor area ratios, and development intensities. This is done in relation to sensitive receptor viewer groups who would be exposed to potential changes. While the ultimate location and scale of future developments would evolve over time, this evaluation is in consideration of the viewer groups who may experience such change. It is important to note that visual change does not constitute a significant impact under CEQA, rather, the change must result in a substantial adverse effect, substantial damage, or

substantial degradation in the existing qualities of the visual environment for the impact to be considered significant.

This approach ensures that the environmental analysis conservatively evaluates the full buildout envelope of the Proposed Project, such that future development facilitated by the Proposed Project would not result in impacts beyond those disclosed herein. Visual impacts are assessed by examining the anticipated contrast between the maximum buildout scenario and the existing visual character of the Project Site and surrounding area, with particular emphasis on building height, massing, bulk, and site intensity, which are the primary determinants of visual character at the plan level.

The methodology is consistent with State CEQA Guidelines Section 15146 and 15168, which allows environmental analysis at a programmatic level where site-specific details are not yet available, provided that the analysis evaluates the maximum reasonably foreseeable development scenario. The analysis, therefore, provides a comprehensive evaluation of aesthetic impacts associated with implementation of the Proposed Project.

The term *viewshed* is used throughout this aesthetics analysis. A viewshed comprises all the surface areas visible from an observer's viewpoint. The limits of a viewshed are defined as the visual limits of the views from the Project Site. It also includes the locations of viewers likely to experience the changes brought about by the Proposed Project. In a densely developed urban setting, viewsheds are typically constrained by topography, clusters of mature trees, and building placements. Due to the difficulty of discerning smaller scale design features in an urban setting, a half-mile limit is frequently an appropriate viewshed boundary marker; whereas viewshed boundaries are set at greater distances when significant large-scaled visual resources are present or are being proposed (e.g., tall buildings; local mountains; large tree clusters or geological formations) because, depending on the vantage point, such elements can often be seen across distances of several miles.

Viewer sensitivity is defined both as the viewer's concern for scenic quality and the viewer's response to change in the visual resources that make up the view. The sensitivity of viewers in their perception of visual quality, as well as their sensitivity to changes in visual quality, varies based on familiarity with the view, sense of ownership of the view, and the nature of one's activity while receiving the view.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the

Proposed Project contained in Section 3.1.4, *Project Impact Analysis*, and 3.1.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan (and subsequent projects analyzed through addenda to the 2014 Master Plan EIR) would not result in significant aesthetic impacts related to scenic vistas, visual character, or light and glare. The demolition of the Women's and Children's Hospital was previously identified as a significant impact on scenic resources, but because the building was demolished in 2021, this impact is not relevant to the Proposed Project. Table 3.1-1, *Summary of the 2014 Master Plan EIR Aesthetics Impact Conclusions*, provides an overview of previous aesthetic impact conclusions for the Campus.

Table 3.1-1 Summary of the 2014 Master Plan EIR Aesthetic Impact Conclusions

Significance Criteria[1]	Significance before Mitigation	Mitigation Measure[2]	Significance after Mitigation
AES-1: Would the project have a substantial adverse effect on scenic vistas?	No Impact (construction) Less Than Significant (operation)	MM-AES-1	No Impact (construction) Less Than Significant (operation)
AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant (construction) No Impact (operation)	MM-CR-2	Significant and Unavoidable (construction) No Impact (operation)
AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Less Than significant (construction and operation)	None	Less Than Significant (construction and operation)
AES-4: Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	No Impact (construction) Less Than Significant (operation)	None	No Impact (construction) Less Than Significant (operation)

Source: County of Los Angeles 2014

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which are sometimes different.
2. See Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, for a complete list of mitigation measures from in the 2014 Master Plan EIR, along with proposed revisions.

3.1.4 Project Impact Analysis

As previously described, Public Resources Code 21099 applies to the Proposed Project as a mixed-use residential and employment center project on an infill site within a TPA. Therefore, the Proposed Project is exempt from a determination of significant aesthetic impacts. This discussion is provided for information purposes only and not for determining whether the Proposed Project would result in significant impacts to the environment.

a) Would the project have a substantial adverse effect on a scenic vista?

CONSTRUCTION

The Project Site viewshed does not contain any recognized scenic vistas. Informal and intermittent views of the General Hospital Building, downtown skyline, local foothills, and mountain ridgelines are available from the surrounding public viewsheds. Construction activities, which are of temporary duration and have been occurring on the northwest part of the Campus for several years, would include the presence of construction vehicles, cranes, and barricading as well as extensive grading, excavation, hauling, soil stockpiling, and new landscape installation. Construction equipment would be staged within the boundaries of the Campus; the specific staging locations would be determined by the construction contractor(s) in consultation with the County. Staging for construction efforts on the main campus would be at a lower grade and largely not visible to off-site viewers.

On-site viewers, including patients, visitors, and employees, may experience temporary changes in visual conditions during construction; however, these effects would be short-term and typical of ongoing previously approved redevelopment on the urbanized Project Site. Although views from some locations on the Project Site may be obstructed by construction of new buildings, these views are informal (e.g., ordinary views that can be acquired from hundreds of vantages throughout the viewshed and do not merit official recognition), and no views of designated or recognized scenic vistas would be obstructed as none are available within the Project Site viewshed. Thus, impacts on a scenic vista during construction would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

OPERATION

As discussed above under Existing Conditions, no designated scenic vistas have been identified within the Project Site viewshed, and no recognized scenic vistas were identified within the community. While the General Hospital Building is a scenic resource and is visible from locations throughout the surrounding area due to its visible scale and prominence, it is located within a highly developed and urbanized part of Los Angeles and does not make up a dominant portion of the viewshed. Therefore, it does not constitute a clearly defined scenic vista.

As noted above, informal views of scenic vistas from some locations on and around the Project Site may be obstructed by new buildings; however, no designated scenic vistas or views would be obstructed or affected. The Proposed Project would facilitate development of new buildings, increased landscaping, and overall comprehensive integration of land uses on the east and west parts of the Project Site. The Proposed Project would allow for greater levels of development intensity and site activation than currently exist on the main campus. However, the height of any future development would not exceed that of the existing General Hospital Building (19 stories above grade) and key views to the General Hospital Building from on-site locations and surrounding roadways would be maintained to ensure no obstruction of views of the General Hospital Building.

The Proposed Project would implement podium massing, which is designed to maintain the flexibility of form and use of upper-level development. At grade, architecture and massing would respond to the intensity and diversity of public activity. The Master Plan would not impose fixed height limits across the Project Site; building height and massing would be responsive to the General Hospital Building, specifically new development in proximity to the General Hospital Building. As identified in the proposed Master Plan, new development in proximity to the Forecourt would be limited to approximately four to five stories to avoid visual interference with the façade of the Forecourt and the General Hospital Building. Development within the western portion of the main campus would be designed to retain views to the upper portion of the General Hospital Building.

Under Proposed Project conditions, two view corridors would be maintained and would protect views of the General Hospital Building. No new building, structure, or portion would intrude into a protected view corridor, which would be defined as a continuous vertical plane, running from each designated viewport to the General Hospital Building façade. One of the two view corridors would be established to maintain sightlines, wayfinding, and a circulation corridor that recognizes the visual prominence of the General Hospital Building and its importance as the heart of a new urban village; this central spine of open space would run east to west within the Project Site from the center of the General Hospital Building's main entrance through the axis framed by the forecourt buildings, between the footprints of new development, and continuing to the center of the Project Site. The second view corridor would be maintained from the intersection of Zonal Avenue and State Street to the General Hospital Building and would preserve unobstructed views of the General Hospital Building's uppermost four stories.

New street trees and new open spaces would also be added in areas that are now paved and occupied by infrastructure, storage areas, and underutilized buildings. Overall, future development under the Proposed Project would visually connect the west and east parts of the Project Site that are currently visually disjointed. The Proposed Project includes the adaptive reuse of the General Hospital Building to house a mix of uses; however, all changes to this building would be done in compliance with the Secretary of the Interior's Standards to preserve the building's historic defining features (see Chapter 3.4, *Cultural Resources*, for more

information), and the building would remain in a similar visible fashion as its current conditions. Further, only informal views of the General Hospital Building are available from the surrounding public viewsheds, and those would remain with implementation of the Proposed Project. Thus, **less-than-significant impacts** on a scenic vista would occur as a result of the operation of the Proposed Project.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?

No designated scenic highways, corridors, or parkways have been identified within or near the Project Site. The nearest officially designated State Scenic Highway is SR-2 located approximately 12 miles northeast of the Project Site. As previously discussed, a portion of the SR-110 (Arroyo Seco Historic Parkway Scenic Byway) between US-101 and E Colorado Boulevard in Pasadena is identified by Caltrans as an official Federal Byway (Caltrans 2025b). The SR-110 is 1.46 miles northwest of the Project Site. Due to distance, topography, and intervening development, the majority of Project Site is not visible from the SR-110; only distant fleeting views of portions of the upper levels of the General Hospital Building are visible.

CONSTRUCTION

Construction of the Proposed Project would involve demolition of existing structures, grading, and building construction, which would require the use of heavy equipment (e.g., excavators, cranes, haul trucks), staging areas, and temporary construction fencing. These activities would temporarily alter view within and around the Project Site.

The Project Site is fully developed and in an urbanized area of the City of Los Angeles. No rock outcroppings exist within or around the Project Site. The Project Site is not visible from a designated State Scenic Highway and only distant and fleeting views of portions of the upper levels of the General Hospital Building are visible from SR-110.

The 2014 Master Plan EIR identified several scenic resources within the boundaries of the Campus, including the General Hospital Building and the Women's and Children's Hospital. It should be noted that the Women's and Children's Hospital buildings were demolished in 2021 pursuant to the 2014 Master Plan EIR; the 2014 Master Plan EIR determined that the demolition of the Women's and Children's Hospital would result in significant and unavoidable scenic resources impacts. Because the buildings associated with the Women's and Children's Hospital were demolished in 2021 and the site on which the former Women's and Children's Hospital was located is currently under construction as part of the Restorative Care Village (RCV), this previous impact is not applicable to the Proposed Project. The Project Site is not within a viewshed of a State Scenic Highway, and the Proposed Project would not degrade the views

from the SR-110; thus, impacts on scenic resources within a scenic highway corridor from construction would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

OPERATION

As previously discussed, the Proposed Project includes the demolition of existing structures, including two structures that were not previously identified for demolition under the 2014 Master Plan EIR. These structures include the Pharmacy Building and Tunnel/Viaduct. As further discussed in Chapter 3.4, *Cultural Resources*, of this Draft SEIR, these structures are not eligible for historic designation, are not visible from a scenic highway, and are not considered scenic resources. Additionally, the Tunnel/Viaduct and Pharmacy Building are not visible from the SR-110. Therefore, the Proposed Project would not substantially degrade the view from the scenic byway.

The Project Site contains native trees, specifically the southern California black walnut tree. Construction could potentially affect these trees; however, these trees do not represent a regionally or locally significant population, and are not visible from the SR-110 (see Chapter 3.3, *Biological Resources*). Any construction activities would alter localized tree cover but would not substantially change the overall visual character of the Project Site, given the increase in landscaped areas that is proposed.

The Proposed Project would include the adaptive reuse of the General Hospital Building and surrounding areas within the Los Angeles General Hospital-Acute Unit Building Historic District; however, all changes to this feature would be done in compliance with the Secretary of the Interior's Standards to preserve historic-defining features, and the building would remain visible from the Federal Byway as under existing conditions. The proposed Master Plan would establish view corridors to preserve and uplift the historic monumentality of the General Hospital Building. Additionally, the massing strategy was designed to respond to the Project Site's unique site topography, adjacency to existing medical uses on the Campus, and historic preservation goals related to the General Hospital (see Chapter 2, *Project Description*). New development near the forecourt would remain limited to four or five stories to preserve human scale and avoid competition with the historic façade of the General Hospital Building. Development on the West Campus would respect regional views by remaining below the upper portion of the General Hospital Building, ensuring that new development reinforces, rather than overwhelm, the building. Through careful massing, setbacks, and placement, the Proposed Project would protect historic viewsheds of the General Hospital Building. The Project Site is not within a corridor of a State Scenic Highway. Given that only distant fleeting views of portions of the upper levels of the General Hospital Building are visible and that the majority of Project Site is not visible from the SR-110 freeway, the Proposed Project would not degrade the views from

the Arroyo Seco Historic Parkway Scenic Byway. Thus, impacts on scenic resources within a scenic highway corridor from operation would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Project Site is in the City of Los Angeles, an urbanized area, defined by the U.S. Census Bureau as a "densely developed territory, and encompass[es] residential, commercial, and other nonresidential urban land uses… [with] at least 2,000 housing units or at least 5,000 people" (U.S. Census Bureau 2020). As described in the 2014 Master Plan EIR, the visual setting of the Campus and surrounding area is characterized by low to high visual quality, providing a flexible urban design context for new development features. As the Project Site is owned and operated by the County, the property is not subject the City of Los Angeles' land use and zoning regulations. Additionally, the Proposed Project includes Use and Development Standards that would establish land use standards applicable to all future implementing projects under the Master Plan to ensure compatibility with the existing and planned character of the surrounding area. Thus, future development under the Master Plan would maintain and enhance the visual character and scenic quality on-site (see Chapter 2, *Project Description*).

CONSTRUCTION

Proposed Project construction activities would occur over 25 years within an existing urbanized area that has undergone extensive development, including recent and ongoing construction associated with the RCV, and where a highly varied range of architectural styles and land uses are in close proximity. Temporary construction features such as equipment, fencing, staging areas, cranes, and earthwork would be typical of urban construction and would not permanently alter visual character or obstruct identified scenic resources.

The Project Site is owned and operated by the County of Los Angeles and the County has elected to apply its own planning and zoning laws; therefore, the County's planning and development framework, including applicable LA County General Plan 2035 and campus planning policies related to design and visual character, governs project implementation. Construction activities would be temporary in nature and would occur in accordance with applicable County requirements governing construction staging, site maintenance, and safety, which are intended to minimize visual disorder during active construction. Because construction-related visual changes would not represent a permanent alteration of visual

character, would be consistent with the existing urban character, and would not conflict with applicable County policies or other regulations governing scenic quality, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

OPERATION

Although the Project Site is located within an urbanized area of the City of Los Angeles, the Project Site is owned and operated by the County. Therefore, as previously identified, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. Nevertheless, State CEQA Guidelines Appendix G checklist question c addresses whether a project would conflict with applicable zoning and other regulations governing scenic quality. Accordingly, this Draft SEIR provides a discussion of consistency with relevant goals, policies, and objectives related to scenic quality in Table 3.1-2, *Proposed Project's Potential to Conflict with Applicable Scenic Quality Policies and Objectives*, for informational purposes.

Table 3.1-2 Proposed Project's Potential to Conflict with Applicable Scenic Quality General Plan Goals, Policies, and Objectives

Goal/Policy/Objective	Potential to Conflict
County of Los Angeles General Plan	
Conservation and Natural Resources Element	
Goal C/NR 13: Protected visual and scenic resources.	**No Conflict.** The Project Site includes the General Hospital Building and Forecourt (a contributor), which is a scenic resource. The Proposed Project would result in the adaptive reuse of the General Hospital Building and Forecourt. The Proposed Project would retain the historic architectural features of the General Hospital Building, which would remain an important and historic focal point on the Project Site (see Chapter 2, *Project Description,* Section 2.4.2, *Proposed Project Land Uses*).
Policy C/NR 13.1. Protect scenic resources through land use regulations that mitigate development impacts.	**No Conflict.** The Project Site includes the General Hospital Building and Forecourt (a contributor), which is a scenic resource. The Proposed Project would result in the adaptive reuse of the General Hospital Building and forecourt. The Proposed Project would retain the historic architectural features of the General Hospital Building, which would remain an important and historic focal point on the Project Site (see Chapter 2, *Project Description,* Section 2.4.2, *Proposed Project Land Uses*). The Proposed Project would not conflict with this policy because the Proposed Project would implement a massing strategy to respond to the unique site topography, and historic preservation

Table 3.1-2 Proposed Project's Potential to Conflict with Applicable Scenic Quality General Plan Goals, Policies, and Objectives

Goal/Policy/Objective	Potential to Conflict
	goals as it relates to the General Hospital Building. As discuss under impact discussion (a), the Master Plan would maintain two view corridors to protect views to the General Hospital Building. Additionally, the Proposed Project would not interfere with the County's ability to protect scenic resources through land use regulations. Therefore, the Proposed Project would not conflict with this policy.
Policy C/NR 13.3. Reduce light trespass, light pollution and other threats to scenic resources.	**No Conflict.** The Proposed Project would introduce new light sources consistent with the existing urban environment, and proposed outdoor lighting would be designed to minimize spillover and glare through the use of shielding, downward-directed fixtures, and other design features.
Policy C/NR 13.4. Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.	**No Conflict.** The Project Site is in an urbanized area of the City of Los Angeles. The Proposed Project's land uses were developed with the surrounding land uses and community context in mind. The Proposed Project would allow new development with more intensity and height, but would generally be consistent and compatible with the visual relationship within and surrounding the Project Site through site planning, building massing, and design features that reflect surrounding development patterns and provide appropriate visual transitions to adjacent uses. Height for new buildings would be regulated based on both the building's height relative to the General Hospital Building and key views to the General Hospital Building from on-site locations and surrounding roadways. Landscaping throughout the Project Site would include California native drought-tolerant lawn, shrubbery, flowers, or trees, compatible with natural vegetation. On steep slopes, terracing strategies would be used to reduce perceived height and accommodate grade changes.
Policy C/NR 13.5. Encourage required grading to be compatible with the existing terrain.	**No Conflict.** The Project Site does not contain prominent natural landforms or varied topography. On steep slopes, terracing strategies would be used to reduce perceived height and accommodate grade changes. Grading associated with the Proposed Project would be compatible with existing site conditions and would not alter or conflict with the surrounding terrain.
City of Los Angeles General Plan	
Framework Element	
Policy 5.2.2. Encourage the development of centers,	**No Conflict.** The Proposed Project emphasizes multimodal access, accessible design, and seamless internal and regional connections,

Table 3.1-2 Proposed Project's Potential to Conflict with Applicable Scenic Quality General Plan Goals, Policies, and Objectives

Goal/Policy/Objective	Potential to Conflict
districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use. Additionally, develop these areas so that they are compatible with surrounding neighborhoods.	including the development of a mobility hub and a system of trails, ramps, stairways, and terraces that integrates with existing pedestrian routes (see Chapter 2, *Project Description,* Section 2.4.3, *Circulation and Access*). The Proposed Project's land uses were developed with the surrounding land uses and community context in mind. Although the Proposed Project would allow development at greater intensity and height than existing conditions, the proposed Master Plan would include development standards that would preclude structures or projections outside the Historic Zone for the General Hospital Building from exceeding the highest elevation point of the roof structure or parapet wall of the historic General Hospital Building.
Goal 5A: A livable city for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.	**No Conflict.** The Proposed Project would add up to 3,200 housing units, 320,000 square feet of retail, and 350,000 square feet of community facilities that would contribute to the facilitation of a livable city. The Proposed Project emphasizes multimodal access, accessible design, and seamless internal and regional connections, including the development of a mobility hub and a system of trails, ramps, stairways, and terraces that integrates with existing pedestrian routes to interconnect surrounding neighborhoods (see Chapter 2, *Project Description,* Section 2.4.3, *Circulation and Access*).
Objective 5.5. Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** Implementation of the Proposed Project would enhance the Project Site and improve aesthetic quality and livability in the surrounding area through the addition of new buildings, open spaces, and site utilities that contribute to a more organized and visually appealing site. The Proposed Project emphasizes multimodal access, accessible design, and seamless internal and regional connections, including the development of a mobility hub and a system of trails, ramps, stairways, and terraces that integrates with existing pedestrian routes (see Chapter 2, *Project Description,* Section 2.4.3, *Circulation and Access*). The organization of open space and podium elements would establish a cohesive and continuous common ground that would function independently from the development above. Podium massing would be designed to shape and support a network of public spaces. Proposed community facilities would enhance public amenities in the area that support social interaction, contributing to a more functional and livable environment for on-site residents and the surrounding community. Additionally, landscape, shade structures and planted

Table 3.1-2 Proposed Project's Potential to Conflict with Applicable Scenic Quality General Plan Goals, Policies, and Objectives

Goal/Policy/Objective	Potential to Conflict
	areas would be integrated throughout the podium to enhance comfort and microclimate.
Open Space Element	
Goal: To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public.	**No Conflict.** The Proposed Project would include the adaptive reuse of the General Hospital and would preserve the character-defining and historic features of the building. The Proposed Project would establish view corridors to preserve the historic monumentality of the building. Additionally, a massing strategy was designed to respond to the unique site topography, adjacencies to existing medical uses on the Campus, and historic preservation goals as it relates to the General Hospital. Height for new buildings would be regulated based on both the building's height relative to the General Hospital Building and key views to the General Hospital Building from on-site locations and surrounding roadways (see Chapter 2, *Project Description,* Section 2.4.6, *Development Standards*).
Conservation Element	
Objective. Protect important natural habitats and scenic sites outside the city which are owned by the city or are impacted by city facilities.	**No Conflict.** The Project Site is entirely developed and is in an urbanized area of the City. No natural habitats or scenic sites are in the vicinity of the Project Site and would not be affected by the Proposed Project.
Policy. Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.	**No Conflict.** The Project Site is entirely developed and is located within an urbanized area of the City. No natural habitats or unique geologic features are on or in the vicinity of the Project Site. No recognized scenic vistas were identified within the Project viewshed; only informal views of the General Hospital, downtown skyline, and local foothills and mountain ridgelines are available from the surrounding public viewsheds. The Proposed Project would preserve the character-defining and historic features of the General Hospital Building. Height for new buildings would be regulated based on both the building's height relative to the General Hospital Building and key views to the General Hospital Building from on-site locations and surrounding roadways. Development standards of the Proposed Project would ensure that sightlines would be maintained.
City of Los Angeles Northeast Community Plan	
Policy 1-3.2. Consider factors, such as neighborhood character and aesthetics, identity;	**No Conflict.** The Proposed Project would add a maximum of 3,200 dwelling units. The Project Site is in an urbanized area characterized by existing buildings, paved streets, and supporting infrastructure.

Table 3.1-2 Proposed Project's Potential to Conflict with Applicable Scenic Quality General Plan Goals, Policies, and Objectives

Goal/Policy/Objective	Potential to Conflict
compatibility of land uses; impacts on livability, services, public facilities, and traffic levels, when changes in residential densities are proposed.	The visual setting of the Campus and surrounding area is characterized by low to high visual quality, providing a flexible urban design context for new development features. Project construction would occur in a flexible, fully urbanized setting that has seen extensive development and where a highly varied range of architectural styles and land uses are in close proximity. The Proposed Project's land uses were developed with the surrounding land uses and community context in mind. New development under the Proposed Project would be designed to remain flexible, consistent, and compatible with the visual relationship within and surrounding the Project Site. The proposed Master Plan would include development standards that would preclude structures or projections outside the Historic Zone for the General Hospital Building from exceeding the highest elevation point of the roof structure or parapet wall of the historic General Hospital Building. New development in proximity to the forecourt would be limited to approximately four to five stories to retain views to the forecourt and General Hospital Building.
Policy 14-2.1. Encourage the preservation, maintenance, enhancement and adaptive reuse of existing buildings in commercial areas through the restoration of original facades and the design of new construction which complements the old in a harmonious fashion, enhancing the historic pattern.	**No Conflict.** The Proposed Project incorporates adaptive reuse strategies where feasible while addressing the aging utilities and infrastructure within the Campus. See also discussion of Policy C/NR 13.1.

Source: City of Los Angeles 1973, 1999, 2001; County of Los Angeles 2025.

As shown in Table 3.1-2, the Proposed Project would be consistent with the relevant goals, policies and objectives in City of Los Angeles General Plan, County of Los Angeles General Plan, and Northeast Los Angeles Community Plan. In addition, because the Proposed Project is within a transit priority area, pursuant to Public Resources Code Section 21099(d)(1), aesthetic impacts of a mixed-use residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, there would be **less than significant impacts** related to conflicts with zoning or other regulations governing scenic quality.

Significance without Mitigation: Less than significant. No mitigation is necessary.

d) Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area, or result in substantial shadow impacts on shadow-sensitive land uses?

CONSTRUCTION

Construction activities are expected to primarily occur during allowable construction hours of 7:00 am to 7:00 pm on Monday through Saturday, consistent with LA County Code of Ordinances Section 12.08.440. If, during development of the final construction schedules for phased activities under the Proposed Project, it is deemed necessary to work outside the permitted hours, the Project Applicant would follow necessary procedures to obtain an appropriate variance in accordance with Section 12.08.580 of the County of Los Angeles Code of Ordinances. Therefore, construction activities are unlikely to substantially alter ambient light levels or result in significant spillover light impacts on surrounding land uses, as construction would primarily occur during daylight hours. The Project Site is in a fully urbanized setting with numerous existing sources of light and glare. These sources of light and glare include existing Campus health services buildings and existing buildings along adjoining streets, streetlights, vehicular headlights, and reflective surfaces associated with nearby buildings and paved areas. There is little potential for construction activities to produce substantial glare because construction is temporary and typically involves non-reflective or matte-finished equipment and materials that are not designed to reflect sunlight. Any temporary lighting used for safety or security would be limited in duration, low-intensity, and directed downward in accordance with standard construction practices, thereby minimizing light spill or glare onto adjacent uses or public rights-of-way. In addition, although no shade-sensitive viewing groups are currently present within the Project Site or its immediate off-site perimeter, there is no potential for construction equipment and activities (e.g., cranes) to cast substantial shadow/shade. Shade/shadows that may be cast during construction would result from temporary equipment that is typically not fixed/stationary and would not result in substantial changes. Construction activities resulting from the Proposed Project, when considered in addition to existing sources of light and glare in the urban environment, would be negligible; and **less-than-significant** project construction impacts related to light, glare, shade, and shadow would occur.

Significance without Mitigation: Less than significant. No mitigation is necessary.

OPERATION

Existing on-site sources of artificial light include light emanating from building interiors and outdoor building, security, sidewalk, and parking lot lights. Existing off-site lighting sources include street lighting, vehicular lighting, and exterior lighting on existing commercial, industrial, and residential uses. Existing sources of glare include reflective building materials such as glass windows and façades, vehicle headlights, and reflective surfaces associated with paved

roadways, parking areas, and commercial storefronts. The nearest light and glare sensitive receptors are the residences south of the Project Site, across Marengo Street.

The Proposed Project would result in new buildings and structures on-site. The Proposed Project would introduce development intensities and types to the Project Site that exceed assumptions in the 2014 Master Plan EIR; however, the type of development that are being proposed would not be new to the area given the developed urban context. Lighting associated with the proposed residential, commercial, medical, office, retail, warehouse, parking, and open space uses would be consistent with those emanating from similar uses that currently exist on-site or in the immediate vicinity of the Project Site (see Chapter 3.10, *Land Use and Planning*). Lighting from new development on the Project Site would be consistent with the existing urban environment and would generally conform to lighting and glare regulations, including but not limited to the regulations listed above in Section 3.1.1, *Regulatory Framework*.

The proposed outdoor lighting would be designed to minimize spillover lighting and glare through the use of shielding, downward-directed fixtures, and other design features. Some of the design elements for light control and reduced spillover lighting for the proposed outdoor lighting include limiting the mounting height and steep aiming angles, various lighting modes, visors and shielding, reflective housing around the luminaires, limiting the number of luminaires, and appropriate light levels based on location of the lights. The proposed light poles would incorporate all these elements, and each element can be arranged individually to control and minimize any potential spillover lighting impacts. Additionally, there are existing outdoor street light poles in the surrounding area.

Regarding shade and shadow effects, any new shadowing would primarily occur during lower sun-angle periods and the extent and duration of shadows would depend on the final design of individual developments. Given the existing development context, the presence of existing tall structures, and the lack of sensitive receptors that would be directly affected (routinely useable outdoor spaces associated with residential or institutional land uses; pedestrian-oriented outdoor areas or restaurants with outdoor eating areas; nurseries; solar collectors; or recreational areas), the Proposed Project is not anticipated to result in adverse effects related to shade and shadow. Due to the separation between proposed building areas and nearby residential uses, projected shadows extending to the east and south would dissipate before reaching off-site properties or would occur only briefly during early morning or late afternoon hours when sunlight availability is already reduced. The surrounding residential uses are separated from the primary building envelopes by existing Project Site development, roadways, and setbacks, which limit the extent to which Proposed Project-generated shadows could reach residential areas. Any incremental shading that may occur would be consistent with shadow patterns typical of an urban campus environment.

Therefore, the Proposed Project would not result in substantial sources of light, glare, shade, or shadows given the surrounding existing conditions in a highly developed urban environment, and impacts are **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.1.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative aesthetics impacts is limited to locations that have clear sightlines to the Project Site. The cumulative geographic study area boundaries extend to 0.5 miles from the main campus perimeter. This cumulative study area was selected as it encompasses the area from which the Proposed Project and nearby cumulative projects would be visible and where their combined visual effects could reasonably occur. The cumulative projects that are within 0.5 miles of the main campus perimeter include the Boyle Heights Community Plan update (Cumulative Project 3), USC Discovery and Translation Hub (Cumulative Project 7), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13).

The full list of 13 cumulative projects is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to aesthetics?

SCENIC VISTAS

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in temporary construction activities that have a substantial adverse effect on scenic vistas. No designated scenic vistas have been identified within the 0.5-mile cumulative geographic study area. Construction of these projects, in combination with the Proposed Project, could result in temporary visual obstructions, such as cranes, scaffolding, and construction equipment, which may intermittently affect views across the cumulative geographic study area. However, these effects would be short-term, localized, and reversible, and would not result in permanent obstruction of scenic vistas. The Proposed Project's construction activities would occur on a rolling and phased basis, and any view disruptions would cease upon completion of construction. The Proposed Project's contribution to cumulative impacts would not be cumulatively considerable because it would not result in the permanent loss or substantial degradation of scenic vistas, and temporary construction-

related obstructions would not combine with other projects to create a substantial adverse visual condition. Accordingly, cumulative impacts related to scenic vistas during construction would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Proposed Project and the cumulative projects are located within an urbanized environment characterized by built structures and limited long-range scenic views. New cumulative development would occur on previously disturbed or developed parcels. Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, substantially create an adverse effect on a scenic vista. As previously noted, no recognized scenic vistas were identified within the Project Site viewshed; only informal views of the General Hospital Building, downtown skyline, and local foothills and mountain ridgelines are available from the surrounding public viewsheds. Ordinary views within the viewshed, which do not capture the above-referenced visual resources, are generally of moderately low to moderate visual quality, and would be mostly preserved. The proposed Master Plan would include development standards that would preclude structures or projections outside the Historic Zone for the General Hospital Building from exceeding the highest elevation point of the roof structure or parapet wall of the historic General Hospital Building. Additionally, new development near the Forecourt would be limited to approximately four to five stories to preserve human scale and avoid competing with the historic façade of the General Hospital Building. A central spine of open space would run east to west within the Project Site to maintain sightlines and a view corridor at the intersection of Zonal Avenue and State Street would be maintained to preserve views to the General Hospital Building. In addition, the Proposed Project would implement a massing strategy to respond to the Project Site's unique topography.

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in a substantial adverse effect on a scenic vista. The projects identified in Chapter 3 that are within the geographical study area include Cumulative Projects 3, 7, 10, 11, 12, and 13. As a land use plan, Cumulative Project 3 could potentially introduce increased density, scale, and height than what currently exists in the surrounding area. Cumulative Project 7 would include the development of a seven-story structure; Cumulative Projects 10, 11, and 12, would include a crypt expansion and seismic retrofit and maintenance improvements to the Medical Examiner Building, which is located on-site; and Cumulative Project 13 would include the development of a surface parking lot. No recognized scenic vistas were identified within the Proposed Project viewshed, and as the cumulative related projects are within 0.5 miles of the Project Site and are located in densely developed urban settings, the viewsheds of the cumulative related project would be similarly constrained by topography and building placements. In addition, the cumulative

projects would be required to comply with applicable zoning regulations regarding massing and size to reduce any potential impacts related to the obstruction of a scenic vista. Because no recognized scenic vistas are identified within cumulative geographic study area viewshed, and cumulative development would occur within a highly urbanized environment characterized by existing buildings and limited scenic resources, cumulative impacts to scenic vistas would not be significant. The Proposed Project would not contribute to cumulative impacts on scenic vistas because no recognized scenic vistas are present within the Project Site and cumulative geographic study area viewshed. In addition, development under the Proposed Project includes development standards to ensure that future development facilitated by the Proposed Project would not significantly nor negatively affect scenic vistas, nor result in effects that are potentially cumulatively significant. Therefore, the Proposed Project's contribution would not be cumulatively considerable, and cumulative impacts to scenic vistas would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

VIEWS FROM A SCENIC HIGHWAY

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in substantial degradation to scenic resources within a State scenic highway during construction. No officially designated State scenic highways are located within the cumulative geographic study area viewshed. The Project Site is not visible from the Arroyo Seco Historic Parkway Scenic Byway, a designated federal scenic byway. Only portions of the upper levels of the General Hospital Building are visible from the Arroyo Seco Historic Parkway Scenic Byway. Therefore, construction activities associated with the Proposed Project, including the presence of construction equipment, stating areas, and temporary lighting, would not be visible from a State scenic highway and would not affect scenic resources or views from such roadways.

Similarly, while cumulative projects in the surrounding area may involve construction activities, the absence of visibility between the Project Site and a State scenic highway precludes the potential for combined visual effects on scenic highway views. Additionally, the 05.-mile cumulative study area is not within the viewshed of any State scenic highway. Accordingly, the Proposed Project would not result in an impact and would not contribute to a cumulatively considerable impacts related to scenic resources within a State scenic highway. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

The cumulative geographic study area is located in a highly urbanized portion of the City of Los Angeles, where cumulative growth is generally limited to infill redevelopment. As previously noted, no designated scenic highways, corridors, or parkways have been identified within the Project viewshed. The Arroyo Seco Historic Parkway Scenic Byway is identified by Caltrans as an official Federal Byway and is 1.46 miles northwest of the Project Site. Due to distance, topography, and intervening development, only portions of the upper levels of the General Hospital Building are visible from the southbound lanes of the SR-110 freeway. No rock outcroppings exist within the cumulative project viewshed, which is heavily urbanized. Trees within the cumulative project viewshed consist of ornamental street trees associated with existing development. These trees contribute to the localized streetscape character, but they do not constitute a scenic resource at the scale of a highway viewshed. The Proposed Project would not require removal of mature, visually prominent tree stands that could otherwise be considered scenic resources and would not introduce substantial changes to tree patterns visible from the Arroyo Seco Historic Parkway Scenic Byway. Cumulative projects would occur on dispersed sites with the existing tree canopy consisting primarily of ornamental street trees within developed areas. These trees contribute to localized streetscape character rather than broader scenic views, and any potential tree removal with cumulative projects would be limited in scope and dispersed, avoiding any meaningful change to views from the scenic byway. To the extent that the Proposed Project or cumulative projects add new landscaping, this would likely include ornamental and shade trees consistent with existing urban conditions, which would not alter or diminish scenic views from the byway. While the cumulative project in the geographic study area would introduce additional development, such changes would occur within a setting already dominated by buildings, streets, and infrastructure, and are unlikely to alter the scenic qualities of the Arroyo Seco Historic Parkway Scenic Byway or any other designated scenic highways. Because the identified cumulative projects are unlikely to alter the scenic qualities of the Arroyo Seco Historic Parkway Scenic Byway or any other designated scenic highway due to distance topography, and intervening development, cumulative impacts related to scenic highway views would not be significant. Accordingly, the Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

SCENIC QUALITY

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in conflicts with regulations related to scenic quality during construction.

While multiple projects could be under construction concurrently, these activities would be temporary, phased, and geographically dispersed, and would not result in a sustained or permanent change to the visual character of the area. The visual environment would be restored upon completion of construction activities. The Proposed Project's contribution would not be cumulatively considerable because construction-related visual changes are inherently temporary and reversible, and would not combine with other projects to result in a substantial adverse effect on visual character or quality. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts related to scenic quality and visual character do not require individual projects to violate zoning or design regulations. Rather, cumulative impacts may occur when numerous compliant projects incrementally alter the visual environment over time, resulting in a collective change in scale, massing, density, or visual complexity within a cumulative geographic study area. The cumulative geographic study area is located within an urbanized area, characterized by existing buildings, paved streets, and supporting infrastructure. The cumulative geographic study area is located in a highly urbanized portion of the City of Los Angeles, where cumulative growth is generally limited to infill development. As described above, the visual setting of the Project Site viewshed is characterized by low to high visual quality, providing a flexible urban design context for new development features. As with the Proposed Project, the identified cumulative project would be required to comply with applicable regulations regarding design and character to reduce any potential impacts to scenic quality and to ensure that individual projects would be visually consistent with the established scenic quality of the geographic study area. As described in impact discussion (c), the Proposed Project would not conflict with City and County policies and regulations intended to govern scenic quality. Therefore, while cumulative impacts related to the conflict with applicable zoning and other regulations governing scenic quality may be significant in the region, the Proposed Project would not introduce development features that are unusual, incompatible, or inconsistent with adopted scenic-quality regulations. The Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

LIGHT/GLARE AND SHADE/SHADOW

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in substantial light and glare during construction.

Construction lighting would be temporary, directional, and limited to active work areas, and would be discontinued upon completion of construction. The use of standard construction practices would minimize light spillover and glare effects. The Proposed Project's contribution to cumulative light and glare impacts would not be cumulatively considerable because these effects would be short-term and would not result in permanent increases in light or glare levels. Multiple construction projects would not combine to create a substantial long-term adverse lighting condition as construction activities are short-term and occur on varying schedules, limiting the potential for overlapping effects. Similarly, shade/shadow impacts resulting from temporary equipment that is typically not fixed/stationary, would not combine to create a substantial shade/shadow impact as shadows cast would be brief and localized. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Project Site is located within an urbanized area that includes a variety of residential, commercial, and public uses. The cumulative geographic study area is located in a highly urbanized portion of the City of Los Angeles, where cumulative growth is generally limited to infill development. Existing sources of light and glare in the area of the identified cumulative projects are similar to those that would be found in any urbanized area, and include streetlamps, parking-lot lighting, storefront and signage lighting, interior and exterior building illumination, security lighting, and car headlights. Nighttime lighting is necessary to provide and maintain safe, secure, and attractive environments; however, these lights have the potential to produce spillover light and glare. Although nighttime light is a common feature of urban areas, spillover light can adversely affect light-sensitive uses, such as residential units at nighttime. Future development under Cumulative Project 3 could include the development of housing, commercial, recreational, and other land uses in the cumulative geographic study area that could incrementally increase the number and intensity of artificial light sources over time, which would increase nighttime lighting and sources of daytime glare, and cumulative light and glare impacts could occur. However, nearby cumulative projects would also be implemented in an urban setting where street lighting, parking area lighting, and lights from automobiles are common. Because cumulative projects would be distributed across a broad urbanized area, their lighting and glare effects would be dispersed and not concentrated in a way that would collectively result in a substantial cumulative effect on any single sensitive receptor. Additionally, each cumulative project is located within the City of Los Angeles and would be required to comply with applicable City lighting regulations. Similarly, there are no known physical development projects within the immediate vicinity of the Project Site that would cumulatively contribute to a substantial impact related to increased shade/shadow, and there are no sensitive shade/shadow receptors that would be cumulatively affected. Therefore, while light, glare, and shade/shadow impacts may occur in the cumulative study area, the Proposed

Project's contribution would not be cumulatively considerable and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.1.6 Comparison to the 2014 Master Plan EIR Impact Analysis

The 2014 Master Plan EIR relied on the Federal Highway Administration (FHWA) *Visual Impact Assessment for Highway Projects*. The FHWA *Visual Impact Assessment for Highway Projects* provides useful tools for assessing visual impacts for highway and roadway projects where the visual landscape is dominated by natural features and the introduction of built infrastructure can significantly alter visual character (FHWA 2015). However, the methodology is less applicable for land use development projects that are on a specific site, such as the Proposed Project, rather than along a linear corridor. In such cases, the CEQA Guidelines provide that consistency evaluations with applicable zoning and policies governing scenic quality are more appropriate when projects are located within an urbanized area. In addition, Public Resources Code Section 21099 was introduced after the 2014 Master Plan EIR, which provides that for infill projects within TPAs, aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, reliance on the FHWA methodology is not warranted.

As described in Section 3.1.4, *Project Impact Analysis*, and 3.1.5, *Cumulative Impact Analysis*, the Proposed Project would result in four no impacts or less-than-significant impacts associated with scenic vistas, views from scenic highways, visual character/conflicts with zoning and regulations governing scenic quality, and light and glare although the Proposed Project would result in a higher land use density than the 2014 Master Plan. The Proposed Project would occur within the same Project Site analyzed in the 2014 Master Plan EIR; both projects assumed ground-disturbing activities across the entire Project Site. Since the certification of the 2014 Master Plan EIR, the Women's and Children's Hospital was demolished and is no longer an impact. Additionally, as further discussed in Chapter 3.4, *Cultural Resources*, the Pharmacy Building and Tunnel/Viaduct are not eligible historic buildings and the demolition of these structures as a result of the Proposed Project would not impact scenic resources within a State scenic highway.

As shown in Table 3.1-1, *Summary of the 2014 Master Plan EIR Aesthetics Impact Conclusions*, the 2014 Master Plan EIR concluded that the 2014 Master Plan would result in three no impacts or less-than-significant aesthetic impacts during construction and operation associated with scenic vistas, visual character, and light and glare, and one significant and unavoidable impact associated with scenic resources during project construction. MM-CR-2 was identified in the 2014 Master Plan EIR to mitigate impacts associated with scenic resources and required documentation of the Women's and Children's Hospital prior to its demolition. This mitigation

measure is no longer applicable to the Proposed Project because the Women's and Children's Hospital was demolished in 2021. Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, lists the mitigation measures of the 2014 Master Plan EIR side by side with the mitigation measures in this Draft SEIR for comparative purposes.

3.1.7 References

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3.2 AIR QUALITY

This chapter describes the existing air quality setting of the Project Site surrounding area and identifies applicable regulatory requirements. This chapter also identifies potential impacts that could result from future development associated with the Proposed Project, and as necessary, recommends mitigation measures to avoid/reduce the significance of impacts.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, comments were received regarding air quality impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where a comment regarding air quality was also received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are summarized in Table 1-1, *Summary of Scoping Commented Received*. Comments related to air quality were considered in the preparation of this analysis.

Terminology

The following are definitions for terms used throughout this section.

- **AAQS.** Ambient air quality standards.
- **AQMP.** Air quality management plan.
- **ATCM.** Airborne toxics control measure
- **CARB.** California Air Resources Board.
- **Criteria air pollutants.** Those air pollutants specifically identified for control under the Federal Clean Air Act (currently six: carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and particulates).
- **DPM.** Diesel particulate matter.
- **LST.** Localized significance threshold.
- **Ppm.** parts per million.
- **SoCAB.** South Coast Air Basin.
- **South Coast AQMD.** South Coast Air Quality Management District.
- **TAC.** Toxic air contaminant.
- **µg/m^3.** micrograms per cubic meter.
- **VMT.** Vehicle miles traveled.

CRITERIA AIR POLLUTANTS

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, as a result of their presence in elevated concentrations in the atmosphere. Pollutants emitted

directly from a source (e.g., vehicles and stationary equipment) are known as primary air pollutants while secondary air pollutants are formed through chemical and photochemical reactions in the atmosphere. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, SO_2, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. VOC and NO_X are criteria pollutant precursors that form secondary criteria air pollutants. Ozone (O_3) and NO_2 are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (SoCAB), the highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious – maintenance)[1] under the National AAQS (CARB 2025a).
- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of O_3, South Coast AQMD has established a significance threshold (South Coast AQMD 2023a). The health effects for ozone are described later in this section.
- **Nitrogen Oxides (NO_X)** are a by-product of fuel combustion and contribute to the formation of ground-level O_3, PM_{10}, and $PM_{2.5}$. The two major forms of NO_X are nitric oxide (NO) and nitrogen dioxide (NO_2). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO_X produced by combustion is NO, but NO reacts quickly with oxygen to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 is an acute

[1] A maintenance area refers to a previously nonattainment area that has been redesignated to "maintenance" after it meets the standards and additional redesignation requirements in the Clean Air Act (Section 107(d)(3)(E)).

irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO_2 is only potentially irritating. NO_2 absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO_2 exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO_2 exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO_2 concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2025a).

- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO_2. When sulfur dioxide forms sulfates (SO_4) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_X). Thus, SO_2 is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO_2 may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO_2, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations, and when combined with particulates, SO_2 may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated as attainment under the California and National AAQS (CARB 2025a).
- **Suspended Particulate Matter (PM_{10} and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM_{10}, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.002.5 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM_{10} and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's (USEPA) scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than PM_{10} to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased

respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005, 2022).

There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the USEPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB 1999, 2025b). Particulate matter can also cause environmental effects such as visibility impairment,[2] environmental damage,[3] and aesthetic damage[4] (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is a nonattainment area for $PM_{2.5}$ under California and National AAQS and a nonattainment area for PM_{10} under the California AAQS (CARB 2025a).[5]

- **Ozone (O_3)** is a key ingredient of "smog" and is a gas that is formed when VOCs and NO_X, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O_3 is a secondary criteria air pollutant. O_3 concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O_3 poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O_3 can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O_3 also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O_3 also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, O_3 harms sensitive vegetation during the growing season (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2025a).
- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the

[2] $PM_{2.5}$ is the main cause of reduced visibility (haze) in parts of the United States.

[3] Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

[4] Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

[5] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour PM_{10} standards from 2004 to 2007. The USEPA approved the State of California's request to redesignate the South Coast PM_{10} nonattainment area to attainment of the PM_{10} National AAQS, effective on July 26, 2013.

nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005, 2022; USEPA 2025a). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the USEPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the USEPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.[6] Emissions of lead are found only in projects that are permitted by South Coast AQMD. Additionally, the project would not include any improvements or features that would be a source of lead. Therefore, lead is not a pollutant of concern for the proposed project.

Table 3.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

Table 3.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	▪ Chest pain in heart patients ▪ Headaches, nausea ▪ Reduced mental alertness ▪ Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O_3)	▪ Cough, chest tightness ▪ Difficulty taking a deep breath ▪ Worsened asthma symptoms ▪ Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight

[6] Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

Table 3.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Nitrogen Dioxide (NO_2)	▪ Increased response to allergens ▪ Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM_{10} and $PM_{2.5}$)	▪ Hospitalizations for worsened heart diseases ▪ Emergency room visits for asthma ▪ Premature death	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO_2)	▪ Aggravation of respiratory disease (e.g., asthma and emphysema) ▪ Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	▪ Behavioral and learning disabilities in children ▪ Nervous system impairment	Ore and metals processing facilities and lead-acid battery manufacturers.

Source: CARB 2025c.

TOXIC AIR CONTAMINANTS

CARB has identified other air pollutants as toxic air contaminants (TACs), which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2025b). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The most relevant TAC to the Project is particulate matter from diesel-fueled engines (diesel PM).

Diesel Particulate Matter

In 1998, CARB identified particulate emissions from diesel-fueled engines as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute)

exposure can cause irritation and inflammatory symptoms and may exacerbate existing allergies and asthma symptoms (USEPA 2002).

3.2.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL AND STATE

Ambient air quality standards have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The proposed project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD, the California AAQS adopted by CARB, and National AAQS adopted by the USEPA. Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS as well as the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 3.2-2, *Ambient Air Quality Standards for Criteria Air Pollutants*. These pollutants are O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard1	Federal Primary Standard2	Major Pollutant Sources
Ozone (O_3)[3]	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m^3	150 µg/m^3	
Respirable Fine Particulate	Annual Arithmetic Mean	12 µg/m^3	9 µg/m^3	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard1	Federal Primary Standard2	Major Pollutant Sources
Matter ($PM_{2.5}$)[4,6]	24 hours	*	35 µg/m^3	reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
Lead (Pb)	30-Day Average	1.5 µg/m^3	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4)[5]	24 hours	25 µg/m^3	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.

Table 3.2-2 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard1	Federal Primary Standard2	Major Pollutant Sources
Vinyl Chloride	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2024.

Notes: ppm: parts per million; $\mu g/m^3$: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1. California standards for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than O_3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
3. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
4. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
5. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
6. On February 7, 2024, the national annual $PM_{2.5}$ standard was lowered from 12 $\mu g/m^3$ to 9 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary), secondary annual $PM_{2.5}$ standard, and PM_{10} standards (primary and secondary) were retained.

California has also adopted a host of other regulations that reduce criteria pollutant emissions:

- **Title 20 of California Code of Regulations (CCR): Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances.
- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977.
- **24 CCR, Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.[7]

California Air Resources Board

CARB is a part of the California Environmental Protection Agency and responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (see Table 3.2-2, *Ambient Air Quality Standards for Criteria Air Pollutants*), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the EPA.

Nuisance Regulations

California Code Health and Safety Code Section 41700 states,

> ... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

[7] The green building standards became mandatory in the 2010 edition of the code.

This section also applies to objectionable odors.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health" (17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Regulation generally restricting on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **13 CCR Chapter 10 Section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally, restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
- **13 CCR Section 2477 and Article 8:** Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate. Regulations established to control emissions associated with diesel-powered TRUs.

Assembly Bill 617, Community Air Protection Program

AB 617 (C. Garcia, Chapter 136, Statutes of 2017) requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. In response to AB 617, CARB established the Community Air Protection Program.

Air districts are required to host workshops to help identify disadvantaged communities disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations have been identified and the communities have been selected, new community monitoring systems are installed to track and monitor community-specific air pollution goals. In 2018 CARB prepared an air monitoring plan (Community Air Protection Blueprint) that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, the Blueprint is required to be updated every five years.

Under AB 617, CARB is also required to prepare a statewide strategy to reduce TACs and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology; adopt new rules requiring the latest best available retrofit control technology for all criteria pollutants for which an area has not achieved attainment of California AAQS; and provide uniform, statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the communities impacted by air pollution that CARB identifies. The proposed Master Plan area is within the designated East Los Angeles, Boyle Heights, West Commerce (ELABHWC) AB 617 community, which adopted a Community Emissions Reduction Plan (CERP) on September 6, 2019 (South Coast AQMD 2019).

REGIONAL

South Coast Air Quality Management District

The South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD is responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). The AQMP is a regional strategy plan to achieve air quality standards by examining emissions, looking at regional growth projections, and the impact of existing and proposed control measures to provide healthful air in the long-term. Since 1979, a number of AQMPs have been prepared.

The CAA requires CARB to develop a SIP that describes how an area will attain National AAQS. The AQMP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the SIP. Areas are classified as attainment or nonattainment areas for a particular pollutant depending on whether they meet the AAQSs.

2022 Air Quality Management Plan

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, as an update to the 2016 AQMP. On October 1, 2015, the EPA strengthened the National AAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb) (2015 Ozone National AAQS). The SoCAB is currently classified as an "extreme" nonattainment for the 2015 Ozone National AAQS. Meeting the 2015 federal ozone standard requires reducing NO_X emissions, the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations by 2037. The only way to achieve the required NO_X reductions is through extensive use of zero emission (ZE) technologies across all stationary and mobile sources. South Coast AQMD's primary authority is over stationary sources which account for approximately 20 percent of NO_X emissions. The overwhelming majority of NO_X emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile sources that are mostly beyond the South Coast AQMD's control. The region will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP requires substantial reliance on future deployment of advanced technologies to meet the standard. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low-NO_X technologies and (2) developing new ZE and ultra-low NO_X technologies for use in cases where the technology is not currently available. South Coast AQMD is prioritizing distribution of incentive funding in environmental justice areas and seeking opportunities to focus benefits on the most disadvantaged communities (South Coast AQMD 2022).

South Coast AQMD $PM_{2.5}$ Redesignation Request and Maintenance Plan

In 1997, the EPA adopted the 24-hour fine $PM_{2.5}$ standard of 65 µg/m^3. In 2006, this standard was lowered to a more health-protective level of 35 µg/m^3. The SoCAB is designated nonattainment for both the 65 µg/m^3 and 35 µg/m^3 24-hour $PM_{2.5}$ standards. In 2020, monitored data demonstrated that the SoCAB attained both 24-hour $PM_{2.5}$ standards. The South Coast AQMD developed the "2021 Redesignation Request and Maintenance Plan" for the 1997 and 2006 24 hour $PM_{2.5}$ Standards for the SoCAB, demonstrating that the SoCAB has met the requirements to be redesignated to attainment for the 24-hour $PM_{2.5}$ standards (South Coast AQMD 2021a). However, in July 2025, USEPA did not issue a determination of attainment and instead, issued a Clear Data Determination (CDD) for the SoCAB for the 2006 24-hour $PM_{2.5}$ standard (Vol. 89 Federal Register, No. 227, 92873.).[8] Additionally, South Coast AQMD adopted

[8] The issued CDD suspends the requirements for the area to submit an attainment demonstration, reasonable further progress plan, quantitative milestones and quantitative milestone reports, contingency measures, and any other SIP revisions related to attainment of the 2006 24-hour $PM_{2.5}$ so long as the SoCAB continues to meet the standard. However, the SoCAB remains in nonattainment.

the "South Coast Air Basin Attainment Plan for the 2012 Annual $PM_{2.5}$ Standard" on June 7, 2024 (South Coast AQMD 2024). This plan requests a 5-year extension from the current attainment deadline of December 31, 2025 established under the 2016 AQMP and demonstrates attainment of the 2012 12 µg/m^3 annual $PM_{2.5}$ standard by December 31, 2030 (South Coast AQMD 2025a).

South Coast AQMD Rules and Regulations

All projects are subject to South Coast AQMD rules and regulations in effect at the time of activity, including:

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.
- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities.
- **Rule 445, Wood Burning Devices.** In general, the rule prohibits new developments from installing wood-burning devices. This rule is intended to reduce the emission of particulate matter from such devices and applies to manufacturers and sellers of wood-burning devices, commercial sellers of firewood, and property owners and tenants that operate a wood-burning device.
- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOC content of architectural coatings used on projects in the South Coast AQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast AQMD must comply with the current VOC standards in this rule.

- **Rule 1166, Volatile Organic Compound Emissions from Decontaminated Soil.** Under this rule, an excavation plan is required, and excavation operations are required to be monitored for VOC concentrations.
- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.
- **Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants,** to minimize the amount of off-site fugitive dust emissions containing TACs by reducing particulate emissions in the ambient air as a result of earthmoving activities, including excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable TACs. Components of the fugitive dust control plan are required to include the following measures: fencing that is a minimum of six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of 50 ± 5 percent; monitoring; notification; signage; and recordkeeping.
- **Rule 2305, Warehouse Indirect Source Rule: Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program.** The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program aims to reduce NOx and DPM emissions associated with warehouses, help meet federal standards and improve public health, especially in communities located near warehouses in the South Coast AQMD. This rule requires warehouse owners and operators of warehouses that have 100,000 square feet or more of indoor floor space in a single building to report information about their facility and the actions they completed to comply with the rule. The WAIRE is a menu-based point system. Warehouse operators are required to earn a specific number of points every year. This is based on the number of trucks trips made to and from the warehouse each year. Points can be earned through: completing any combination of actions in the WAIRE menu; or completing actions in an approved, site-specific custom WAIRE Plan; or paying a mitigation fee.

LOCAL

County of Los Angeles General Plan

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) includes goals and policies in the Air Quality Element to reduce air quality impacts. Goals and policies that apply to the Project include the following below (County of Los Angeles 2015).

Goal AQ 1: Protection from exposure to harmful air pollutants.

- **Policy AQ 1.1.** Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- **Policy AQ 1.2.** Encourage the use of low or no volatile organic compound (VOC) emitting materials.
- **Policy AQ 1.3.** Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.
- **Policy AQ 1.4.** Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.

Goal AQ 2: The reduction of air pollution and mobile source emissions through coordinated land use, transportation and air quality planning.

- **Policy AQ 2.1.** Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.
- **Policy AQ 2.2.** Coordinate with local, regional, state, and federal agencies to develop and implement community and regional air quality plans and programs.
- **Policy AQ 2.3.** Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.
- **Policy AQ 2.4.** Coordinate with different agencies to minimize fugitive dust from different sources, activities, and uses.
- **Policy AQ 2.5.** Encourage land use development and design that integrates GHG emission reduction strategies through increasing residential density and infill development, especially affordable housing and diversity of destinations near High-Quality Transit Areas.
- **Policy AQ 2.6.** Expand infrastructure to accommodate transit and alternative modes of transportation to serve residential, employment, and recreational trips.
- **Policy AQ 2.7.** Explore the feasibility of parking strategies that limit or remove parking minimums to reduce vehicular trips.
- **Policy AQ 2.8.** Encourage and support the development and implementation of Zero-Emission technology and infrastructure in an equitable manner to ensure access to all County residents.
- **Policy AQ 2.9.** Electrify entire County light-duty and bus and shuttle fleet vehicles.

Goal AQ 3: Implementation of plans and programs to address the impacts of climate change.

- **Policy AQ 3.1.** Facilitate the implementation and maintenance of the Climate Action Plan through future County programs to ensure that the County reaches its climate action and greenhouse gas emission reduction goals, and consider projects with an enforceable legal obligation to achieve "net zero" greenhouse gas (GHG) emissions, including by voluntary agreement to resolve litigation or with a government agency, to help the County achieve the long-term goals of the CAP.
- **Policy AQ 3.2**. Reduce energy consumption in existing buildings and County operations through energy efficiency retrofits.
- **Policy AQ 3.4**. Participate in local, regional and state programs to reduce greenhouse gas emissions.
- **Policy AQ 3.5**. Phase in the decarbonization of existing and new development.
- **Policy AQ 3.6**. Support local solar power generation on new and existing buildings and parking lots.
- **Policy AQ 3.9**. Ensure the availability of zero-carbon electricity to serve unincorporated Los Angeles County.
- **Policy AQ 3.11**. Promote sustainable waste practices through public outreach, educational programs, and mandates.
- **Policy AQ 3.12.** Ensure and promote the availability of organics waste and recyclable materials diversion services for beneficial use, such as composting, energy production, and upcycling.
- **Policy AQ 3.13.** Collaborate with environmental organizations, businesses, schools, and the general public to promote the importance of climate action.

City of Los Angeles General Plan

Air Quality Element

The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles (City of Los Angeles 1992). Adopted in November 1992, the City's General Plan includes goals, objectives, and policies that help define how the City will achieve its clean air goals. The Air Quality Element's six goals are as follows:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non- work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand- management techniques
- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality

- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Health Element: Plan for Healthy Los Angeles

The Plan for a Healthy Los Angeles, adopted in 2015, lays the foundation to create healthier communities for all residents in the City. As an element of the City's General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food (City of Los Angeles 2021).

3.2.2 Existing Conditions

SOUTH COAST AIR BASIN

The Project Site is in the SoCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

METEOROLOGY

Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted

to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains.

Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, especially along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 2005).

Wind

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion (sinking air from high pressure systems) and the radiation inversion (cooling of the earth's surface by radiation). The height of the base of the inversion at any given time is known as the "mixing height." Inversions create a layer of warmer air above cooler/colder air, which can stagnate vertical mixing and dispersion leading to worsened air quality. The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the Project area (South Coast AQMD 2005).

SOCAB NONATTAINMENT AREAS

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the SIP. Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the ambient air quality standards. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- **Unclassified.** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment.** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment.** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- **Nonattainment/Transitional.** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SoCAB is shown in Table 3.2-3, *Attainment Status of Criteria Air Pollutants in the South Coast Air Basin*.

Table 3.2-3 Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone – 1-hour	Extreme Nonattainment	No Federal Standard
Ozone – 8-hour	Extreme Nonattainment	Extreme Nonattainment
PM_{10}	Serious Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment[1]
CO	Attainment	Attainment (Serious – Maintenance)
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Nonattainment (Los Angeles County only)[2]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: CARB 2025a.

1. The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The 2021 $PM_{2.5}$ Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow USEPA to redesignate the SoCAB to attainment for the 65 µg/m^3 and 35 µg/m^3 24-hour $PM_{2.5}$ standards. CARB submitted the 2021 $PM_{2.5}$ Redesignation Request to the USEPA as a revision to the California SIP (CARB 2021).
2. In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 National AAQS as a result of large industrial emitters. Remaining areas for lead in the SoCAB are unclassified. However, lead concentrations in this nonattainment area have been below the level of the federal standard since

December 2011 (South Coast AQMD 2012). On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the EPA revised in 2008. The SIP revision was submitted to the EPA for approval and was approved in March 2014 (CARB 2014).

MULTIPLE AIR TOXICS EXPOSURE STUDY V

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In April 2021, South Coast AQMD released the latest update to the MATES study, MATES V. The first MATES analysis, MATES I, began in 1986 but was limited because of the technology available at the time. Conducted in 1998, MATES II was the first MATES iteration to include a comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was conducted in 2004 to 2006, with MATES IV following in 2012 to 2013.

MATES V uses measurements taken during 2018 and 2019, with a comprehensive modeling analysis and emissions inventory based on 2018 data. The previous MATES studies quantified the cancer risks based on the inhalation pathway only. MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been reexamined using current Office of Environmental Health Hazards Assessment (OEHHA) and California Environmental Protection Agency (CalEPA) risk assessment methodologies and modern statistical methods to examine the trends over time.

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. Per MATES V, cancer risks for the Project Site area and surrounding areas range between 625 to 682 in a million (South Coast AQMD 2025b). DPM continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risks. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities (South Coast AQMD 2021b).

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project area are best documented by measurements taken by the South Coast AQMD. The

project area is located within Source Receptor Area (SRA) 1 – Central Los Angeles.[9] The air quality monitoring station with the most recent data closest to the project area is the Los Angeles-Main Street Monitoring Station, which is one of 31 monitoring stations South Coast AQMD operates and maintains within the SoCAB.[10] This station monitors one-hour and eight-hour O_3, NO_2, PM_{10}, and $PM_{2.5}$. Table 3.2-4, *Ambient Air Quality Monitoring Summary*, shows that the area commonly exceeds the state and federal one-hour and eight-hour O_3 standards in addition to the state 24-hour PM_{10} and federal 24-hour $PM_{2.5}$ standards within the last four years.

Table 3.2-4 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Threshold Were Exceeded and Maximum Levels during Such Violations[1,2]			
	2021	2022	2023	2024
Ozone (O_3)				
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	1	1	1	2
State & Federal 8-hour ≥ 0.070 ppm (days exceed threshold)	2	6	7	6
Max. 1-Hour Conc. (ppm)	0.099	0.138	0.097	0.107
Max. 8-Hour Conc. (ppm)	0.086	0.091	0.083	0.082
Nitrogen Dioxide (NO_2)				
State 1-Hour ≥ 0.18 ppm (days exceed threshold)	0	0	0	0
Max. 1-Hour Conc. (ppb)	0.078	0.075	0.064	0.080
Coarse Particulates (PM_{10})				
State 24-Hour > 50 µg/m^3 (days exceed threshold)	14	0	1	2
Federal 24-Hour > 150 µg/m^3 (days exceed threshold)	0	0	0	0
Max. 24-Hour Conc. (µg/m^3)	138.4	61.0	58.0	78.0
Fine Particulates ($PM_{2.5}$)				
Federal 24-Hour > 35 µg/m^3 (days exceed threshold)	13	0	0	7
Max. 24-Hour Conc. (µg/m^3)	61.0	33.7	30.6	55.7

Source: CARB 2025d.

Per South Coast AQMD Rule 701, an SRA is defined as follows: "A source area is that area in which contaminants are discharged and a receptor area is that area in which the contaminants accumulate and are measured. Any of the areas can be a source area, a receptor area, or both a source and receptor area." There are 37 SRAs within the South Coast AQMD's jurisdiction.

[10] Locations of the SRAs and monitoring stations are shown here: http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

Notes: ppm = parts per million; ppb = parts per billion; µg/m3 = micrograms per cubic meter
1. Data for O_3, NO_2, $PM_{2.5}$, and PM_{10} from the Los Angeles-Main Street Monitoring Station.
2. Most recent data available as of December 2025.

Existing Emissions Inventory

The existing land uses in the Project Site consist of various medical and hospital uses and other ancillary uses. These operations currently generate criteria air pollutant emissions from area sources (e.g., consumer cleaning products, landscaping equipment, and VOC emissions from paints), energy consumption (e.g., natural gas used for cooking, heating, etc.), and mobile sources (e.g., vehicle trips). Table 3.2-5, *Maximum Daily Operation Phase Emissions: Existing Uses*, shows the daily emissions generated by the existing uses within the Project Site.

Table 3.2-5 Maximum Daily Regional Operational Phase Emissions: Existing Uses

Sources	Criteria Air Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Baseline Year 2025						
Mobile - Passenger Cars	154	101	1,610	3	342	88
Mobile - Light-Duty Trucks	1	10	17	<1	8	2
Mobile - Medium-Duty Trucks	<1	6	3	<1	2	1
Mobile - Heavy-Duty Trucks	<1	25	10	<0	5	2
Area	93	1	165	<1	<1	<1
Energy	2	32	27	<1	2	2
Total Daily Emissions	**250**	**174**	**1,831**	**4**	**361**	**95**
Year 2050[1]						
Mobile - Passenger Cars	88	42	945	3	298	76
Mobile - Light-Duty Trucks	1	1	6	<1	10	3
Mobile - Medium-Duty Trucks	<1	2	1	<1	3	1
Mobile - Heavy-Duty Trucks	<1	22	8	<1	8	2
Area	93	1	165	<1	<1	<1
Energy	2	32	27	<1	2	2
Total Daily Emissions	183	99	1,151	3	322	84

Source: Appendix C.

Notes: Based on highest winter or summer emissions. Manual summation may not equal to the totals shown due to rounding.

1. Represents emissions generated by the existing uses within the Project Site under year 2050 without Project conditions.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

For purposes of this analysis, off-site sensitive receptors include the existing residential homes that surround the Project Site, such as those along Sichel Street to the north, those south of Marengo Street to the south, and the homes east of North Chicago Street to the east. Other nearby off-site sensitive receptors also include Francisco Bravo Medical Magnet High School along Cornwell Street to the east, and East Los Angeles Occupational Center along Marengo Street to the southeast of the Project Site. Existing on-site sensitive receptors, which are those existing receptors within the Community Plan area, but outside of the anticipated areas of development include the admitted patients at the Inpatient Tower as these patients could potentially have an extended stay.[11] Additionally, although workers are generally considered the healthiest segment of the population, potential localized impacts to off-site workers are also evaluated.

3.2.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines, Section III, states that, "Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to

[11] As clarified by case law, including *Ballona Wetlands Land Trust v. City of Los Angeles* and *CBIA v. BAAQMD*, CEQA is directed at evaluating the project's effect on the environment, not the environment's effect on the project. Thus, evaluation of potential impacts to on-site patients is not required under CEQA, however, is included as an exception and for purposes of this analysis only.

make the following determinations." The proposed project would result in a significant air quality impact if it would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations.

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

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

CEQA allows the significance criteria established by the applicable air quality management district or air pollution control district to be used to assess impacts of a project on air quality. South Coast AQMD has established thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 3.2-6, *South Coast AQMD Regional Significance Thresholds*. As lead agency, the County has determined that it will apply these thresholds to determine potential air quality impacts resulting from implementation of the Proposed Project. As previously discussed, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM exposure. However, because the USEPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for them.

Table 3.2-6 South Coast AQMD Regional Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Volatile Organic Compounds (VOCs)	75 lbs./day	55 lbs./day
Carbon Monoxide (CO)	550 lbs./day	550 lbs./day
Nitrogen Oxides (NO_X)	100 lbs./day	55 lbs./day
Sulfur Oxides (SO_X)	150 lbs./day	150 lbs./day
Particulates (PM_{10})	150 lbs./day	150 lbs./day
Particulates ($PM_{2.5}$)	55 lbs./day	55 lbs./day

Source: South Coast AQMD 2023.

Health Outcomes Associated with the South Coast AQMD Regional Significance Thresholds

Projects that exceed the South Coast AQMD's regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Increases cancer risk ($PM_{2.5}$, TACs)
- Aggravates respiratory disease (O_3, $PM_{2.5}$)
- Increases bronchitis (O_3, $PM_{2.5}$)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath (O_3)
- Reduces resistance to infections and increases fatigue (O_3)
- Reduces lung growth in children ($PM_{2.5}$)
- Contributes to heart disease and heart attacks ($PM_{2.5}$)
- Contributes to premature death (O_3, $PM_{2.5}$)
- Contributes to lower birth weight in newborns ($PM_{2.5}$) (South Coast AQMD 2025d)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of $PM_{2.5}$ is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 3.2-6, *South Coast AQMD Regional Significance Thresholds*, are not correlated with concentrations of air pollutants, but mass emissions still contribute to the cumulative air quality impacts in the SoCAB. The thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based National AAQS. Regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 3.2-6 would not violate regional air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels presented in Table 3.2-6, then those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants regionally. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 3.2-6, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (Friant Ranch, L.P.) (2018) 6 Cal.5th 502, Case No. S21978. South Coast AQMD currently does not have methodologies that would provide the District with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[12] Ozone concentrations are dependent on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

[12] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of Proposed Projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

Localized Significance Thresholds

Criteria Air Pollutants

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 3.2-7, *South Coast AQMD Localized Significance Thresholds*. The LSTs evaluate whether emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Per the South Coast AQMD LST methodology, off-site mobile-source emissions are not included in the LST analysis (South Coast AQMD 2008). In addition, because the LSTs for PM_{10} and $PM_{2.5}$ are based on the 24-hour standard, only receptor locations where a receptor can reasonably be present for a 24-hour period (e.g., residence) are considered. However, the LSTs for CO and NO_X, which are based on the shorter 1-hour and/or 8-hour standards, can be applicable to non-residential receptors, such as a commercial use, as it is reasonable to assume a worker could be present for 1 to 8 hours (South Coast AQMD 2008). A project would result in a significant impact if it generates emissions that, when added to the local background concentrations (for NO_X and CO), violate the AAQS.

Table 3.2-7 South Coast AQMD Localized Significance Thresholds

Air Pollutant (Relevant AAQS)	Concentration
1-Hour CO Standard (CAAQS)	20 ppm
8-Hour CO Standard (CAAQS)	9.0 ppm
1-Hour NO_2 Standard (CAAQS)	0.18 ppm
24-Hour PM_{10} Standard – Construction (South Coast AQMD)[1]	10.4 µg/m^3
24-Hour $PM_{2.5}$ Standard – Construction (South Coast AQMD)[1]	10.4 µg/m^3
24-Hour PM_{10} Standard – Operation (South Coast AQMD)[1]	2.5 µg/m^3
24-Hour $PM_{2.5}$ Standard – Operation (South Coast AQMD)[1]	2.5 µg/m^3

Source: South Coast AQMD 2023.

ppm – parts per million; µg/m^3 – micrograms per cubic meter

1. Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM_{10} and $PM_{2.5}$, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour

standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to the AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[13] As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide, peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection.

The potential for the Proposed Project to cause or contribute to CO hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by South Coast AQMD in support of their AQMPs and considering existing background CO concentrations. As noted above, based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. The analysis included some of Los Angeles' busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F (South Coast AQMD 1992; South Coast AQMD 2003a)

Toxic Air Contaminants

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 3.2-8, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for construction and operation of a project. The type of land uses that typically generate substantial quantities of criteria air pollutants and TACs from operations include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). Educational and recreational land uses do not use substantial quantities of TACs; thus, these thresholds are typically applied to new industrial projects' operations only. Additionally, the purpose of this environmental evaluation is to identify the significant effects of the project on the environment, not the significant effects of

[13] The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

the environment on the project (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369 (Case No. S213478).

Table 3.2-8 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds

Maximum Incremental Cancer Risk (Project-Level)	≥ 10 in 1 million
Cancer Burden (in areas ≥ 1 in 1 million)	> 0.5 excess cancer cases
Hazard Index (project increment)	≥ 1.0

Source: South Coast AQMD 2023.

Cumulative Impacts

In accordance with South Coast AQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth in the SoCAB. Due to the extent of the area potentially impacted from cumulative project emissions, South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the regional emissions thresholds shown in Table 5.2-5 (South Coast AQMD 2003b). Conversely, projects that do not generate emissions exceeding the South Coast AQMD regional emissions thresholds are considered to not be cumulatively significant.

METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project. South Coast AQMD's *CEQA Air Quality Handbook* (Handbook) and updates on its website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts (South Coast AQMD 1993). The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs that were used in this analysis. Overall, the California Emissions Estimator Model Version 2022.1 (CalEEMod) is used to quantify Project-related construction and operation emissions.

Construction

- **Activities, Schedule, and Equipment.** Because the Proposed Project is a broad-based policy plan, how development would occur for the individual land uses accommodated under the Proposed Project over the 25-year buildout period cannot be known with certainty at this time. However, for purposes of emissions modeling and this analysis, the following general methodology was used in determining the modeled construction schedule for the Proposed Project. The CalEEMod default construction durations for site preparation, grading, building construction, paving, and architectural coating activities were adjusted and normalized to an estimated 10-year development phasing that represents a hypothetical scenario in which

development would occur consistently and continuously for the entire period. For demolition activities, the durations are based on preliminary estimates. In addition, although the specific timeline for individual project development is unknown, in order to present a conservative analysis of construction emissions, this analysis assumes the various construction activities (e.g., site preparation, demolition, building construction) would overlap and are given the same start date. Overall, the determined adjusted durations described above in addition to assigning the same construction start date for the construction activities result in a total modeled construction duration of 7.34 years (2,679 calendar days or 1,914 workdays) between years 2026 and 2033. Additionally, for purposes of Project-related construction emissions estimates, it is assumed vertical building construction of up to 50 percent of the proposed land uses could be occurring at any given time. Also, construction assumptions such as construction equipment mix and construction worker trips were based on CalEEMod defaults, given the programmatic nature of the Proposed Project.[14] Table 3.2-9, *Construction Activities, Phasing, and Equipment*, shows the assumed construction activities and the modeled durations and equipment mix for each of the activities.

- **Demolition.** The analysis accounts for the removal of the 28 structures identified for demolition (see Table 2-4 in Chapter 2, *Project Description*) totaling 1,301,389 building square feet (BSF), along with demolition activities associated with the adaptive reuse of the General Hospital, which would generate an estimated 416,456 cubic yards (CY) of demolition debris. Overall, and for purpose of modeling, it assumed demolition activities associated with the General Hospital and the IRD/OPD/Parking Structure #12 area would generate 348,719 tons of demolition debris and demolition activities associated with stabilization plan would generate 95,517 tons of demolition debris material. Additionally, it is assumed all debris material would be exported to an offsite landfill.
- **Grading.** Grading associated with the Proposed Project would result in approximately 182,100 CY of cut and 149,000 CY of fill with 44,000 CY of soil export. It is anticipated the cut material would be moved and stockpiled within the Project Site, proximate to the areas of fill. For purposes of this analysis, the amount of fill material to be moved within the Project Site is assumed to be 149,000 CY.

[14] CalEEMod default construction assumptions are based on construction surveys of various project sites conducted by South Coast AQMD (CAPCOA 2022).

Table 3.2-9 Construction Activities, Phasing, and Equipment

Activities	Construction Duration (month)[1]	Equipment[2]
Demolition: ORD/IPD/Parking Structure #12 Areas Partial Demolition: Historic General Hospital[3]	16 months	▪ 1 concrete/industrial saw ▪ 3 excavators ▪ 2 rubber-tired dozers
Demolition: Main Site Area	16 months	▪ 1 concrete/industrial saw ▪ 3 excavators ▪ 2 rubber-tired dozers
Site Preparation	4 months	▪ 3 rubber-tired dozers ▪ 4 tractors/loaders/backhoes ▪ 4 water trucks[4]
Grading	9 months	▪ 2 excavators ▪ 1 grader ▪ 1 rubber-tired dozer ▪ 2 tractors/loaders/backhoes ▪ 2 scrapers ▪ 8 water trucks[4]
Building Construction	88 months	▪ 1 crane ▪ 3 forklifts ▪ 1 generator set ▪ 3 tractors/loaders/backhoes ▪ 1 welder
Asphalt Paving	7 months	▪ 2 pavers ▪ 2 paving equipment ▪ 2 rollers
Architectural Coating	7 months	▪ 1 air compressor

Note:

1. Durations based on CalEEMod default durations normalized to a 10-year development period and assumes construction activities overlap for purposes of modeling. Months shown are rounded to the nearest whole number. Overall, the adjusted durations with the assumed overlap of all the construction activities result in a total overall modeled construction duration of 7.34 years (2,679 calendar days or 1,914 workdays).
2. Based on CalEEMod defaults.
3. Demolition associated with adaptive reuse renovation work.
4. Number of water trucks based on daily acreage disturbed, 10,000 gallons per acre disturbed, and a 4.000 gallon-capacity water truck (Maricopa 2005).

Operation

- **Transportation.** The primary source of mobile-source emissions is from the combustion of fuel (i.e., gasoline and diesel) associated with on-road vehicle trips to and from the Project Site. Project-related mobile-source emissions for year 2050 are based on calendar year 2050 CalEEMod default emissions data r. Additionally, mobile emissions generated by the existing remaining uses and the new proposed land uses accommodated under the Proposed Project are based on and derived from average daily trip (ADT) generation data and vehicle miles traveled (VMT) data (see Appendix C). Overall, the new proposed land uses are projected to generate 49,360 ADTs and 486,897 VMT per day while the existing remaining uses would generate 39,081 ADTs and 449,063 VMT per day. Overall, the new proposed land uses and the existing remaining uses with the Project Site under year 2050 buildout conditions would generate a combined 88,441 ADTs and 935,960 VMT per day. Existing uses within the Project Site under baseline year 2025 conditions are estimated to generate 45,655 ADTs and 503,279 VMT per day (see Appendix C).
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies in addition to paints for both the existing uses and the new proposed land uses are based on CalEEMod default values and on the modeled building square footage. Additionally, emissions generated from landscaping equipment that are associated with property management are also based on CalEEMod defaults. For hearths associated with the proposed residential uses, it is assumed the proposed dwelling units would have natural gas fireplaces. No woodburning fireplaces are assumed per South Coast Rule 445.
- **Energy.** The County may implement all-electric designs for new buildings accommodated under the Proposed Project. However, for purposes for this analysis, new buildings are assumed to be mixed-fuel buildings utilizing both electricity and natural gas and meet Title 24 standards. Natural gas demands would generate criteria air pollutant emissions from its combustion. As modeled, the new land uses under the Proposed Project would have an annual natural gas use demand of 46,834,712 kilo-British Thermal Units per year (KBTU/yr). For the existing uses within the Project Site, natural gas demands are based on default CalEEMod energy rates. The default energy rates for nonresidential land uses are based on the California Energy Commission's (CEC) 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). In addition, CalEEMod default natural gas usage rates for residential uses are based the CEC Residential Appliance Saturation Study (RASS) also completed in 2019. The RASS surveyed 40,000 homes built between 1935 and 2015 with the average home constructed in 1974 (CAPCOA 2022). The natural gas demand for the existing remaining uses under year buildout year 2050 conditions would be 98,137,492 KBTU/yr. Overall, the combined natural gas demands for the new proposed uses and existing remaining uses within the Project Site would be 144,972,204 KBTU/yr. For baseline year 2025 conditions, the existing uses within the Project Site have natural gas demands of 120,496,924 KTBU/yr.

Health Risk and Air Dispersion Modeling

A construction health risk assessment (HRA) from TACs was prepared for the Proposed Project. Sources evaluated in the HRA include off-road construction equipment and heavy-duty diesel trucks along the truck haul route. Air dispersion modeling of construction emissions was completed using EPA's AERMOD program, which is the preferred industry tool for simulating pollutant concentrations resulting from various types of emissions sources. The HRA was prepared in accordance with guidance published by the Office of Environmental Health Hazard Assessment (OEHHA) to estimate excess lifetime cancer risks and chronic noncancer hazard indices at the nearest maximum exposed off-site and on-site sensitive receptors and assumes 24-hour outdoor exposure with risks averaged over a 70-year lifetime (OEHHA 2015).

DPM emissions were based on the CalEEMod construction runs, using annual exhaust PM_{10} construction emissions presented in pounds (lbs) per day. For purposes of this analysis, construction of the Proposed Project was assumed to occur continuously over a total cumulative duration of approximately 7.34 years (2,679 calendar days or 1,914 workdays) between 2026 and 2033. The average daily emission rates from construction equipment used during the six phases of construction activities under implementation of the Proposed Project were determined by dividing the annual average emissions for each construction year by the number of construction days per year for each calendar year of construction. The off-site hauling emission rates were adjusted to evaluate localized emissions from the haul route distance within 1,000 feet of the Project Site.

Air dispersion modeling using AERMOD was conducted to assess the impact of emitted compounds on sensitive receptors. The model is a steady-state Gaussian plume model and is approved by South Coast AQMD for estimating ground level impacts from point and fugitive sources in simple and complex terrain. Meteorological data from the South Coast AQMD for the nearest representative meteorological station (CELA site) with the five latest available years (2018 to 2023) of records were used to represent local weather conditions and prevailing winds.

For all modeling runs, a unit emission rate of 1 gram per second was used. The unit emission rates were proportioned over the polygonal area sources for on-site construction emissions and divided between the volume sources for off-site hauling emissions. The maximum modeled concentrations for each sensitive receptor type were multiplied by the construction emission rates to obtain the maximum concentrations at the maximum exposed receptors. The following receptor types were evaluated:

- **Off-Site Residents:** The calculated total cancer risk for a resident conservatively assumes that the maximum exposed individual resident (MEIR) is a child beginning as an unborn fetus of a pregnant woman in the third trimester that is born during the approximately 7.34-year construction window; therefore, calculated risk values for years 2026 through part of 2028 (up to 2 years of age) were multiplied by a factor of 10. Calculated risk values for part of year 2028 through 2033 were multiplied by a factor of 3. In addition, it was conservatively

assumed that all receptor types were outdoors 24 hours a day, 260 construction days per year, and exposed to all of the daily construction emissions.

- **Off-Site Students:** Students at the Bravo Medical Magnet High School and the East Los Angeles Occupational Center were modeled as high school age students. The calculated cancer risks for the maximum exposed individual student (MEIS) at each campus are based on the 9 < 16- and 16 < 30-year age bins during the 7.34-year construction window. The calculated risk values for years 2026 through 2027 (ages 14 and 15) were multiplied by a factor of 3. It was conservatively assumed that all student receptors were outdoors 24 hours a day, 180 construction days per year, and exposed to all of the daily construction emissions.
- **Off-Site Workers:** The calculated cancer risks for the off-site maximum exposed individual worker (MEIW) are based on the 16 < 30-year age bin for the entire 7.34-year construction period. It was conservatively assumed that all worker receptors were outdoors 24 hours a day, 180 construction days per year, and exposed to all of the daily construction emissions.
- **On-Site Patients:** For patients at the Los Angeles General Medical Center Inpatient Tower, whom are assumed to be admitted patients who could have an extended continuous stay, the calculated total cancer risk for the maximum exposed individual patient (MEIP) is conservatively based on a pregnant woman in the third trimester that gives birth during the approximately 7.34-year construction window. Calculated risk values for years 2026 through part of 2028 (up to 2 years of age) were multiplied by a factor of 10. The calculated risk values for part of year 2028 through 2033 were multiplied by a factor of 3. It was conservatively assumed that all patients were outdoors 24 hours a day, 260 construction days per year, and exposed to all of the daily construction emissions.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.2.4, *Project Impact Analysis*, and 3.2.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would be consistent with the South Coast AQMD's AQMP and result in a less than significant impact. Additionally, the 2014 Master Plan was also identified to result in less than significant impacts for impacts related to odors and operation-related regional and localized emissions. Construction-related regional emissions would result in less than significant regional impacts with implementation of Mitigation Measures AQ-1 through AQ-3. However, even with implementation of Mitigation Measures AQ-1 through AQ-3, the 2014 Master Plan would result in significant and unavoidable localized construction-related impacts.

Table 3.2-10, *Summary of Air Quality Impact Conclusions in the 2014 Master Plan EIR*, provides an overview of previous air quality impact analyses for the Project Site.

Table 3.2-10 Summary of Air Quality Impact Conclusions in the 2014 Master Plan EIR

Significance Criteria[1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
AQ-1: Conflict or obstruct implementation of the applicable air quality plan.	Less than significant (construction and operation)	None	Less than significant
AQ-2: Violate an air quality standard or contribute substantially to an existing or projected air quality violation.	Potentially significant (construction) Less than significant (operation)	MM-AQ-1 MM-AQ-2 MM-AQ-3	Less than significant (construction and operation)
AQ-3: Result in a cumulatively considerable net increase in a criteria air pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (this includes releasing emissions that would exceed quantitative thresholds for ozone precursors).	Potentially significant (construction) Less than significant (operation)	MM-AQ-1 MM-AQ-2 MM-AQ-3	Less than significant (construction and operation)
AQ-4: Expose sensitive receptors to substantial pollutant concentrations.	Potentially significant (construction) Less than significant (operation)	MM-AQ-1 MM-AQ-2 MM-AQ-3	Significant and unavoidable (construction) Less than significant (operation)
AQ-5: Create objectionable odors that would affect a substantial number of people.	Less than significant (construction and operation)	None	Less than significant

Source: County of Los Angeles 2014

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this Draft SEIR uses current significance criteria, which are sometimes different.
2. See Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, for a complete list of mitigation measures from in the 2014 Master Plan EIR, along with proposed revisions.

3.2.4 Project Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction and Operation

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. Addition, the determination also fulfills the CEQA goal of informing decision makers of the environmental effects of the proposed project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the AQMP. The two principal criteria for conformance with an AQMP are:

- Whether the project is consistent with the regional planning projections.
- Whether the project is consistent with the applicable control measures and emissions reduction policies in the AQMP.

Consistency with Regional Planning Projections

The regional emissions inventory for the SoCAB is compiled by South Coast AQMD and SCAG. Regional population, housing, and employment projections aggregated by SCAG are based, in part, on the land use designations identified in local general plans. These projections form the foundation for the emissions inventory of the AQMP. The demographic trends are incorporated into SCAG's RTP/SCS to determine priority transportation projects and VMT in the SCAG region. Because the AQMP strategy is based on projections from local general plans, projects that are consistent with the local general plan are considered consistent with the air-quality-related regional plan. Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP, the latest of which was adopted in December 2022 and was built upon measures already in place from previous AQMPs, including the 2016 AQMP.

Although the Project Site is owned and operated by the County of Los Angeles, it is in incorporated City of Los Angeles. Additionally, the Project Site is within the City of Los Angeles Northeast Los Angeles Community Plan, which is one of the overall 34 community plan areas that comprise the City of Los Angeles and its General Plan Land Use Element. In general, a Community Plan provides the specific, neighborhood-level detail including land use designations, relevant policies, and implementation strategies necessary to achieve the City's General Plan objectives. Because the Project Site is within the City of Los Angeles, growth projections associated with the Project Site would be based in part on the City's General Plan.

The 2022 AQMP emissions inventory is based on the population projections utilized for SCAG's 2020-2045 RTP/SCS, which is the RTP/SCS prior to the current 2024-2050 RTP/SCS. However, there has been no update to the City of Los Angeles Northeast Los Angeles Community Plan and zoning designation in between the 2020-2045 RTP/SCS and the 2024-2050 RTP/SCS. Thus, it is assumed the growth projections associated with the Project Site were accounted for in both the 2020-2045 RTP/SCS and the 2024-2050 RTP/SCS and would be consistent between the two plans. As discussed in Section 3.12, *Population and Housing*, of this Draft SEIR, the population growth associated with future development under the Proposed Project would not conflict with the growth projections in the 2024–2050 RTP/SCS. Thus, Therefore, the Proposed Project would be consistent with regard to consistency with the 2022 AQMP demographic projections.

Consistency with Clean Air Goals

Construction

Emissions of criteria pollutants associated with future development facilitated by adoption of the Proposed Project could exceed South Coast AQMD thresholds for criteria pollutants. However, under the Proposed Project, future development would be required to comply with CARB's requirements to minimize short-term emissions from on-road and offroad diesel equipment, including its airborne toxic control measures to limit idling of heavy-duty diesel motor vehicles to no more than five minutes. In addition, the Proposed Project would also be required to comply with South Coast AQMD's regulations, such as Rule 403, Fugitive Dust, and Rule 1113, Architectural Coatings. Compliance with these measures and requirements would be consistent with the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Operation

Operation of future development under the Proposed Project would also be required to comply with the 2022 AQMP, which would include compliance with CARB motor vehicle standards, South Coast AQMD regulations for stationary sources and architectural coatings, Title 24 Energy Efficiency Standards, and the growth projections in the latest RTP/SCS. As discussed above, the AQMP includes Connect SoCal's land use and transportation strategies. The applicable land use strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, promoting a green region, and implementing GHG reduction strategies. The applicable transportation strategies include managing congestion through a Congestion Management Process and implementation of a Transportation Demand Management Program and Transportation System Management Plan. The majority of the transportation strategies are to be implemented by local governments, such as cities and counties, as well as other regional agencies such as SCAG and South Coast AQMD, although some strategies may be furthered by individual development projects.

Overall, the Proposed Project would result in the development of infill mixed-use land uses near and along designated high quality transit corridors (HQTC) such as Zonal Avenue, Marengo Street, and Mission Road. The Proposed Project would accommodate a variety of land use types such as residential, office, commercial, educational, and retail along these designated HQTCs. Additionally, the Proposed Project would also adaptively reuse the existing General Hospital. The proposed land uses would be complemented by community and public spaces accommodated under the Proposed Project. In addition, the Proposed Project would include a Mobility Hub that could provide several multimodal features intended to reduce vehicle trips and associated mobile source emissions. This could include enhanced service with local and regional bus connectivity, improvements to the existing internal campus shuttle, shared vehicle parking, shade and seating areas, and bicycle parking/repair station. The proposed pedestrian network would be designed to align with existing pedestrian routes and crosswalks to improve connectivity of the Project Site to the larger surrounding communities. Similarly, the proposed bicycle circulation would also be designed to align with existing bicycle infrastructure and would build upon the existing bikeway along Mission Road that connects into networks along the Los Angeles River and towards Downtown. Furthermore, vehicle circulation would be limited within the main campus and would be directed to designated drop-off areas and parking facilities. Overall, these designs would support active transit and use of public transit and would also be consistent with Connect SoCal's Transit and Multimodal Integration strategies related to expanding the region's networks of bicycle and pedestrian facilities.

Also, the land use development projects accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards (i.e., 24 CCR, Part 6). The current 2025 Building Energy Efficiency Standards include prescriptive photovoltaic (PV) system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as patient and caregiver lodging, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Implementation of PV systems and battery storage in addition to increasing energy efficiency would contribute to reducing criteria air pollutant emissions associated with energy used for heating and cooling.

Summary

As discussed above, future development of the proposed land uses accommodated under the Proposed Project would be consistent with the AQMP control strategies and the AQMP growth projections. Therefore, the operation of future development under the Proposed Project would not conflict with or obstruct the implementation of the applicable air quality plan and impacts are considered **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction

Construction activities under the Proposed Project would temporarily increase PM_{10}, $PM_{2.5}$, VOC, NO_X, SO_X, and CO regional emissions in the SoCAB. The primary source of NO_X, CO, and SO_X emissions is the operation of construction equipment. The primary sources of particulate matter (PM_{10} and $PM_{2.5}$) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. These types of activities would generate exhaust PM emissions, and to a greater extent, fugitive dust emissions. The primary sources of VOC emissions are the application of architectural coating and off-gas emissions associated with asphalt paving. A summary of health impacts associated with air pollutant emissions is found in Table 3.2-1 above.

Construction activities associated with the Proposed Project could occur over an approximately 25-year plus development period, causing short-term emissions of criteria air pollutants. Given the Proposed Project consists of a Community Plan under the full buildout scenario in 2050 and detailed information about its incremental development is not available at this time, it would be speculative to determine whether the scale and phasing of individual projects would exceed the South Coast AQMD's short-term regional construction emissions thresholds. However, for purposes of this analysis, an estimate of construction emissions for the Proposed Project is provided to show the potential maximum daily emissions that could result from implementation of the proposed land uses accommodated under the Proposed Project. The estimate of maximum daily emissions provided in Table 3.2-11, *Maximum Daily Regional Construction Emissions,* is based on a scenario where several construction projects occur at one time, and all construction phases overlap.

Table 3.2-11 Maximum Daily Regional Construction Emissions

Construction Activities	Criteria Air Pollutant Emissions (pounds per day)[1]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition: General Hospital & IRD/OPD/Parking Structure #12	3	68	36	<1	34	8
Demolition: Main Site	2	32	24	<1	10	3
Site Preparation	3	50	37	<1	15	7
Grading	3	30	31	<1	17	4
Building Construction	10	43	171	<1	36	9
Asphalt Paving	1	7	11	<1	1	<1
Architectural Coating	294	5	60	<1	12	3
Maximum Daily Emissions[2]	**316**	**232**	**369**	**1**	**124**	**33**
South Coast AQMD Regional Significance Threshold	75	100	550	150	150	55
Exceeds Threshold?	Yes	Yes	No	No	No	No

Source: See Appendix C.

Notes: Based on highest winter or summer emissions.

1. Includes implementation of fugitive dust control measures consistent with South Coast AQMD Rule 403, which includes watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces (for modeling purposes), and street sweeping with Rule 1186–compliant sweepers.
2. From the overlap of all the construction activities in 2026.

As shown in the table, construction activities associated with development of the Proposed Project could potentially exceed the South Coast AQMD regional threshold for VOC and NO_X. The primary source of NO_X emissions is vehicle and construction equipment exhaust. NO_X is a precursor to the formation of both O_3 and particulate matter (PM_{10} and $PM_{2.5}$). The primary source of VOC is off-gassing from paints used for architectural coating. VOC is a precursor to the formation of O_3. Emissions of VOC and NO_x that exceed the South Coast AQMD regional threshold would cumulatively contribute to the O_3 nonattainment designation of the SoCAB. Emissions of NO_x that exceed South Coast AQMD's regional significance thresholds would cumulatively contribute to the O_3 and particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB. It is possible that future individual projects accommodated under the Proposed Project may not exceed the South Coast AQMD regional significance thresholds. However, as shown in Table 3.2-11, the collective scale and extent of construction activities associated with all the future development projects accommodated under the Proposed Project would exceed the South Coast AQMD thresholds for VOC and NO_X. Therefore, construction-related regional air quality impacts of developments that would be accommodated by the proposed project would be potentially **significant**.

Impact AIR-1: Implementation of the Proposed Project would generate construction emissions that exceed the South Coast AQMD regional significance thresholds.

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

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

- Use construction equipment rated by the United States Environmental Protection Agency (USEPA) as having Tier 4 Final or higher exhaust emission limits for offroad equipment with engines 25 horsepower or higher. If Tier 4 Final equipment is not readily available, the contractor may apply other technologies available for construction equipment such that it would achieve a comparable reduction in NO_X and PM emissions comparable to that of Tier 4 construction equipment. Where alternatives to USEPA Tier 4 are utilized, the contractor shall be required to show evidence to the Project Applicant(s) that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit.
- Maintain a list of all operating equipment in use on the construction site during construction for verification by the County of Los Angeles Building and Safety Department. The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site.
- Haul and delivery truck idling times shall be minimized by shutting equipment off when not in use or reducing maximum idling time to less than three (3) minutes (beyond that required by 13 California Code of Resources [CCR] Chapter 10, Section 2485). Clear signage shall be provided for construction workers and construction vehicles at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.
- A traffic control plan shall be prepared and provided to the County.
- A carpool program for construction workers, including incentivizing carpooling as well providing bus service for crew members shall be implemented.
- Truck deliveries shall be consolidated when possible.
- The combined vehicle miles traveled per day for offsite haul truck trips associated with demolition debris and earthen material export/import hauling operations shall not exceed 8,930 miles per day (equivalent to 180 one-way truck haul trips at 49.61 miles per one-way trip, which is the average distance to nearby serving landfills). The construction contractor(s) overseeing hauling operations shall log the number of daily haul truck loads and the one-way haul trip distance for each truck haul load of either demolition debris or earthen material for days in which truck hauling of these materials occurs.
- The measures under this mitigation measure shall be noted on all site and construction plans.

Significance with Mitigation: Less than significant. As shown in Table 3.2-12, *Maximum Daily Regional Construction Emissions with Mitigation*, implementation of Mitigation Measures AIR-1a and AIR-1b would reduce Proposed Project-related construction emissions to below the South Coast AQMD regional significance thresholds. Therefore, with implementation of Mitigation Measures AIR-1a and AIR-1b, Impact AIR-1 would be reduced to **less than significant**.

Table 3.2-12 Maximum Daily Regional Construction Emissions with Mitigation

Construction Activities	Criteria Air Pollutant Emissions (pounds per day)[1]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition: General Hospital (interior & partial) & IRD/OPD/Parking Structure #12	1	24	26	<1	18	4
Demolition: Main Site	<1	10	21	<1	5	1
Site Preparation	1	12	33	<1	8	4
Grading	1	7	39	<1	5	1
Building Construction	9	36	172	<1	36	9
Asphalt Paving	<1	2	12	<1	<1	<1
Architectural Coating	42	5	60	<1	12	3
Maximum Daily Emissions[2]	**54**	**92**	**361**	**1**	**84**	**21**
South Coast AQMD Regional Significance Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Appendix C.

Notes: Based on highest winter or summer emissions.

1. Includes implementation of fugitive dust control measures consistent with South Coast AQMD Rule 403, which includes watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces (for purposes of modeling), and street sweeping with Rule 1186–compliant sweepers. Also Includes implementation of Mitigation Measures AIR-1a and AIR-1b, specifically use of construction off-road equipment meeting the Tier 4 Final emissions standards, limiting the number of daily truck haul trips, elimination of diesel-powered generators, and use of coatings with a VOC content of less than 10 g/L.
2. From the overlap of all the construction activities in 2026.

Operation

Buildout of the Proposed Project would develop a mix of uses that include residential, office, medical office, retail, hospital, patient and caregiver lodging, clean tech/light industrial, warehousing, and educational. Operation of these proposed land uses would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). Area-source emissions consist of emissions generated from consumer cleaning products and landscaping equipment used for property and site maintenance, paints used for architectural coating, and hearths. Energy sector emissions would be generated from combustion of natural gas used for cooking and in building heating mechanical systems. Transportation sector emissions would be mobile-source emissions generated from Project-generated vehicles. Mobile-source criteria air pollutant emissions are based on the traffic analysis, which takes into account development of a multimodal circulation and transit network that would serve to enhance connectivity within the Project Site and with

adjacent institutions, neighborhoods, and regional transportation connectors. Overall, the new proposed land uses are projected to generate 49,360 ADTs and 486,897 VMT per day.

The features of the Proposed Project outlined above would promote alternative modes of transportation such as walking and biking in addition to utilizing public transit, which could contribute to minimizing passenger vehicle trips and the resulting VMT that leads to the largest proportion of operational emissions. As shown in Table 3.15-4, *Proposed Project VMT Measured Against Existing Countywide VMT*, of Chapter 3.15 of this Draft SEIR, the Proposed Project would result in a residential and work VMT per capita that are less than the County-wide averages. Furthermore, if the Proposed Project is designed to implement all-electric buildings, it would minimize or eliminate the use of natural gas and the onsite criteria pollutant emissions generated from its combustion. However, as shown in Table 3.2-13, *Maximum Daily Regional Operational Phase Emissions*, due to the projected proposed growth, operation of the land uses accommodated under the Proposed Project at buildout would generate a net increase in criteria air pollutant emissions that exceed South Coast AQMD's regional significance thresholds for VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$ at buildout. Emissions of VOC and NO_x that exceed the South Coast AQMD regional threshold would cumulatively contribute to the O_3 nonattainment designation of the SoCAB. Emissions of NO_x would also cumulatively contribute to the particulate matter (PM_{10} and $PM_{2.5}$) nonattainment designations of the SoCAB. Emissions of PM_{10} and $PM_{2.5}$ would contribute to the $PM_{2.5}$ nonattainment designations. Therefore, the Proposed Project would result in a potentially **significant** impact because it would significantly contribute to the nonattainment designations of the SoCAB.

Table 3.2-13 Maximum Daily Regional Operational Phase Emissions

Sources	Criteria Air Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile - Passenger Cars	192	89	1,983	5	619	157
Mobile - Light-Duty Trucks	1	4	15	<1	25	7
Mobile - Medium-Duty Trucks	<1	4	3	<1	7	2
Mobile - Heavy-Duty Trucks	<1	40	14	<1	14	4
Area	245	58	564	<1	5	5
Energy	2	38	29	<1	3	3
Total Daily Emissions[1]	**442**	**228**	**2,608**	**6**	**673**	**178**
Existing Uses (Year 2050)[2, 3]	183	99	1,151	3	351	94
Net Change	**259**	**129**	**1,457**	**3**	**351**	**94**
South Coast AQMD Regional Significance Thresholds	75	100	550	150	150	55
Exceeds Threshold?	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**

Source: Appendix C.

Notes: Based on highest winter or summer emissions. Manual summation may not equal to the totals shown due to rounding.

1. Represents the combined emissions associated with the proposed new land uses and the remaining existing uses within the Project Site not designated for demolition under year 2050 buildout conditions.
2. Based on the same existing uses within the Project Site as they exist under current baseline year 2025 conditions and calendar year 2050 CalEEMod default vehicle emissions data.
3. To isolate the impacts related to the change in land uses under the Proposed Project, the net change in emissions related to implementation of the Proposed Project is based on the difference in emissions generated by the existing and proposed land uses under year 2050 conditions. This approach is taken as existing land uses would be subject to regulations that come into effect in the future that reduce mobile-source emissions. Thus, the level of emissions the existing land uses generate today would not be generated in perpetuity, but would be affected by these state regulations.

Impact AIR-2: Implementation of the Proposed Project would generate operation emissions that exceed the South Coast AQMD regional significance thresholds.

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

Significance with Mitigation: Significant and unavoidable. Buildout of the Proposed Project would generate long-term criteria air pollutant emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d would contribute to reducing mobile-source, area-source, and energy sector criteria air pollutant emissions to the extent feasible. However, due to the

magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term criteria air pollutant emissions generated from the Proposed Project could still exceed the South Coast AQMD's regional significance thresholds. Therefore, Impact AIR-2 would remain **significant and unavoidable**.

Health Impacts

Contributing to the SoCAB's nonattainment status would also contribute to elevating health effects associated with these criteria air pollutants. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants.

Given the long-term nature of the Proposed Project and the programmatic nature of its implementation, it is speculative to determine precisely how exceeding the regional thresholds would affect the number of days the region is in nonattainment, since mass emissions are not correlated with concentrations of emissions. It Is also not possible to determine with precision how many additional individuals in the air basin would be affected by the health effects cited above. While this Draft SEIR quantifies the increase in criteria air pollutants emissions associated with the Proposed Project at a programmatic level analysis, it is not feasible to quantify the increase in TACs from stationary sources associated with the Proposed Project, or meaningfully correlate how regional criteria air pollutant emissions above the South Coast AQMD significance thresholds correlate with basin wide health impacts.

To determine cancer and noncancer health risk, the location, velocity of emissions, meteorology and topography of the area, and locations of receptors are equally important as model parameters as the quantity of TAC emissions. The white paper, "We Can Model Regional Emissions, But Are the Results Meaningful for CEQA" describe several of the challenges of quantifying local effects—particularly health risks—for large-scale, regional projects, and these are applicable to both criteria air pollutants and TACs (AEP 2020). Similarly, the two amicus briefs filed by the air districts on the Friant Ranch case describe two positions regarding CEQA requirements, modeling feasibility, variables, and reliability of results for determining specific health risks associated with criteria air pollutants (SJVAPCD 2015; South Coast AQMD 2015a). The discussions also include the distinction between criteria air pollutant emissions and TACs with respect to health risks. Additionally, the South Coast AQMD's Significance Thresholds and Monitoring demonstrate the infeasibility based on the current guidance/methodologies. The following summarizes major points about the infeasibility of assessing health risks of criteria air pollutant emissions and TACs associated with implementation of a general plan.

To achieve and maintain air quality standards, the South Coast AQMD has established numerical emission indicators of significance for regional and localized air quality impacts for both construction and operational phases of a local plan or project. The South Coast AQMD has established the thresholds based on "scientific and factual data that is contained in the federal and state Clean Air Acts" and recommends "that these thresholds be used by lead agencies in making a determination of significance" (South Coast AQMD 1993). The numerical emission indicators are based on the recognition that the air basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health. The thresholds represent the maximum emissions from a plan or project that are expected not to cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. By analyzing the plan's emissions against the thresholds, a CEQA analysis (e.g., EIR) assesses whether these emissions directly contribute to any regional or local exceedances of the applicable ambient air quality standards and exposure levels.

South Coast AQMD currently does not have methodologies that would provide the County with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[15] For criteria air pollutants, exceedance of the regional significance thresholds cannot be used to reliably correlate a project to quantifiable health impacts unless emissions are sufficiently high to use a regional model. South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and their effect on health.

Ozone concentrations depend on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Secondary formation of PM and ozone can occur far from sources as a result of regional transport due to wind and topography (e.g., low-level jet stream). Photochemical modeling depends on all emission sources in the entire domain (i.e., modeling grid). Low resolution and spatial averaging produce "noise" and modeling errors that usually exceed individual source contributions. Because of the complexities of predicting

[15] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing Sierra Club v. County of Fresno (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects within the South Coast AQMD region.

ground-level ozone concentrations in relation to the National Ambient Air Quality Standards (AAQS) and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds.

Current models used in CEQA air quality analyses are designed to estimate potential construction and operation emissions for defined projects. The estimated emissions are compared to significance thresholds, which are keyed to reducing emissions to levels that will not interfere with the region's ability to attain the health-based standards. This serves to protect public health in the overall region, but there is currently no CEQA methodology to determine the impact of emissions (e.g., pounds per day) on future concentration levels (e.g., parts per million or micrograms per cubic meter) in specific geographic areas. CEQA thresholds, therefore, are not specifically tied to potential health outcomes in the region.

The Draft SEIR must provide an analysis that is understandable for decision making and public disclosure. Regional-scale modeling may provide a technical method for this type of analysis, but it does not necessarily provide a meaningful way to connect the magnitude of a project's criteria pollutant emissions to health effects without speculation. However, because development within the Project Site area would exceed the regional significance thresholds as presented above in Impact AIR-2, the Proposed Project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction

The Proposed Project could expose sensitive receptors to elevated localized criteria air pollutant and TACs concentrations during construction activities if it would cause or contribute significantly to elevated levels. Unlike the mass of construction emissions, which are described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or µg/m^3) and can be correlated to potential health effects.

LSTs: Criteria Air Pollutants

Table 3.2-14, *Localized Construction Concentrations,* shows the calculated concentration levels associated with the on-site emissions generated from Project-related construction activities. Concentrations shown for CO and NO_X are comprised of the combined Project and ambient background concentrations. Dispersion modeling was conducted using AERMOD, version 13.0.0, air dispersion modeling program. As shown in the table, Project-related construction activities would result in concentration levels at the MEIR and MEIW that exceed the South Coast AQMD LSTs for the NO_X (1-hour). Therefore, without mitigation, construction activities associated with

the Proposed Project would generate emissions that expose receptors to substantial concentrations of criteria air pollutants, and impacts are potentially **significant.**

Table 3.2-14 Localized Construction Concentrations

Receptor	CO (ppm)[1]		NO_X (ppm)[2]	PM_{10} ($\mu g/m^3$)[3]	$PM_{2.5}$ ($\mu g/m^3$)[3]
	1-Hour	8-Hour	1-Hour	24-Hour	24-Hour
Maximum Exposed Individual Resident (MEIR)	1.98	1.63	**0.19**	7.06	1.93
Maximum Exposed Individual Student (MEIS) – Bravo Medical Magnet High School	1.90	1.61	0.14	n/a	n/a
Maximum Exposed Individual Student (MEIS) – East Los Angeles Occupational Center	1.87	1.61	0.12	n/a	n/a
Maximum Exposed Individual Worker (MEIW)	2.03	1.64	**0.21**	n/a	n/a
Maximum Exposed Individual Patient (MEIP)[4]	1.97	1.63	0.178	5.58	1.52
South Coast AQMD LSTs	20.0	9.0	0.18	10.4	10.4
Exceeds Threshold?	No	No	**Yes**	No	No

Source: Appendix C.

Notes: LST – localized significance threshold; ppm – parts per million; $\mu g/m^3$ – micrograms per cubic meter

1. Accounts for year 2024 maximum 1-hour and 8-hour background concentrations of 1.80 ppm and 1.60 ppm, respectively, as measured for SRA 1 – Central Los Angeles (South Coast 2026).
2. Accounts for year 2024 maximum 1-hour background concentration of 0.08 ppm as measured for SRA 1 – Central Los Angeles (South Coast 2026).
3. Applicable only to locations where receptors could reasonably be present over the duration of the 24-hour period per South Coast AQMD LST methodology (South Coast AQMD 2008).
4. As clarified by case law, including *Ballona Wetlands Land Trust v. City of Los Angeles* and *CBIA v. BAAQMD*, CEQA is directed at evaluating the project's effect on the environment, not the environment's effect on the project. Thus, evaluation of potential impacts to on-site patients is not required under CEQA, however, is included as an exception and for purposes of this analysis only.

Impact AIR-3: Implementation of the Proposed Project would generate onsite construction criteria air pollutant emissions that exceed the South Coast AQMD localized significance thresholds.

Mitigation: Implement Mitigation Measure AIR-1b.

Significance with Mitigation: Less than significant. As shown in Table 3.2-15, *Localized Construction with Mitigation*, incorporation of Mitigation Measure AIR-1b, which requires implementation of low-emission construction equipment and operational practices (e.g., Tier 4 equipment, no diesel generators, reducing idling, haul truck limits, and equipment tracking), would reduce NO_X concentration levels to below the South Coast AQMD LST. Therefore, implementation of mitigation would reduce Impact AIR-3 to **less-than-significant**.

Table 3.2-15 Localized Construction Concentrations with Mitigation

Receptor	CO (ppm)[1]		NO_X (ppm)[2]	PM_{10} ($\mu g/m^3$)[3]	$PM_{2.5}$ ($\mu g/m^3$)[3]
	1-Hour	8-Hour	1-Hour	24-Hour	24-Hour
Maximum Exposed Individual Resident (MEIR)	2.00	1.63	0.10	3.43	0.87
Maximum Exposed Individual Student (MEIS) – Bravo Medical Magnet High School	1.91	1.61	0.09	n/a	n/a
Maximum Exposed Individual Student (MEIS) – East Los Angeles Occupational Center	1.87	1.61	0.09	n/a	n/a
Maximum Exposed Individual Worker (MEIW)	2.04	1.65	0.11	n/a	n/a
Maximum Exposed Individual Patient (MEIP)[4]	1.98	1.63	0.10	2.71	0.69
South Coast AQMD LSTs	20.0	9.0	0.18	10.4	10.4
Exceeds Threshold?	No	No	No	No	No

Source: Appendix C.

Notes: LST – localized significance threshold; ppm – parts per million; $\mu g/m^3$ – micrograms per cubic meter

1. Accounts for year 2024 maximum 1-hour and 8-hour background concentrations of 1.80 ppm and 1.60 ppm, respectively, as measured for SRA 1 – Central Los Angeles (South Coast 2026).
2. Accounts for year 2024 maximum 1-hour background concentration of 0.08 ppm as measured for SRA 1 – Central Los Angeles (South Coast 2026).
3. Applicable only to locations where receptors could reasonably be present over the duration of the 24-hour period per South Coast AQMD LST methodology (South Coast AQMD 2008).
4. As clarified by case law, including *Ballona Wetlands Land Trust v. City of Los Angeles* and *CBIA v. BAAQMD*, CEQA is directed at evaluating the project's effect on the environment, not the environment's effect on the project. Thus, evaluation of potential impacts to on-site patients is not required under CEQA, however, is included as an exception and for purposes of this analysis only.

Health Risk: TACs

Implementation of the Proposed Project would temporarily elevate concentrations of TACs and DPM in the vicinity of sensitive land uses during construction activities. As stated, South Coast AQMD currently does not require HRAs for TAC emissions generated by construction equipment during construction-related activities, which primarily consist of DPM. However, this analysis has been included to conservatively gauge the potential health-risk-related impacts of construction activities on off-site sensitive receptors in addition to the on-site patients at the Los Angeles General Medica Center Inpatient Tower. The estimated excess lifetime cancer risk and chronic noncancer hazard index at the nearest sensitive receptors are shown in Table 3.2-16, *Construction Risk Summary*.

Table 3.2-16 Construction Risk Summary

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Individual Resident (MEIR)	7.57	0.02
Maximum Exposed Individual Student (MEIS) – Bravo Medical Magnet High School	0.13	0.004
Maximum Exposed Individual Student (MEIS) – East Los Angeles Occupational Center	0.07	0.002
Maximum Exposed Individual Worker (MEIW)	0.66	0.07
Maximum Exposed Individual Patient (MEIP)	5.98	0.01
South Coast AQMD Thresholds	10	1.0
Exceeds Threshold?	No	No

Source: Appendix C.

Notes:

1. From the overlap of all the construction activities in 2026.

As shown in the table above, the maximum incremental cancer risk during the construction phase for each of the maximum exposed individual receptor types would not exceed the significance threshold of 10 per million. Similarly, for noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one for all the maximum exposed individual receptor types. Therefore, carcinogenic impacts and chronic noncarcinogenic hazards would be **less than significant**.

Significance without Mitigation: Less than significant.

Operation

Operation of certain new land uses and other improvements that may be accommodated under the Proposed Project could generate new sources of criteria air pollutants and TACs from area/stationary sources and mobile sources. In general, types of land uses that typically generate substantial quantities of criteria air pollutants and TACs include industrial with its stationary sources and warehousing land uses that generate a high number of heavy-duty truck trips and operate off-road mobile equipment (e.g., forklifts).

LSTs: Criteria Air Pollutants

Permitted Stationary Sources

The types of land uses that typically generate substantial amounts of stationary source emissions of criteria air pollutants include industrial land uses. In general, the Proposed Project would not accommodate the type of land uses that would generate substantial stationary source criteria air pollutant emissions (e.g., concrete batch plants and refineries). However, as part of the necessary infrastructure improvements, the Proposed Project could include decommissioning and removal of the existing West Central utility plant and installation of a new energy distribution system which could include a new central utility plant to accommodate the energy demands of the Proposed Project. At this time, information on the specific equipment that would be installed and South Coast AQMD would permit at the Central Plant are unknown. Therefore, it is considered speculative for this programmatic analysis. However, installation of additional boilers, chillers, emergency generators, and other stationary equipment (e.g., cogeneration unit) necessary to provide heating and cooling and power needs to the Proposed Project would require a permit to operate from South Coast AQMD as required under South Coast AQMD Regulation XIII, *New Source Review*. This permitting process would be separate from the general occupancy permits issued either by the County and would provide controls for emissions associated with any new or modified future stationary equipment and ensure that applicable emissions standards are met. Therefore, potential operational impacts are **less than significant**.

Non-permitted Sources

Mobile sources of criteria air pollutants are not directly regulated by South Coast AQMD. Up to 160,000 building square feet of proposed warehousing and 200,000 building square feet of proposed light industrial uses accommodated by the Proposed Project could generate substantial criteria air pollutant emissions from onsite truck operation, truck idling, and operation of off-road equipment (e.g., forklifts) used in daily business operations. Proposed warehousing uses are anticipated to support existing ongoing operations of the County at the Project Site (i.e., the existing uses that would remain such as the Medical Center). Additionally, if the proposed warehousing or light industrial uses includes cold storage, then it could also result in the use transport refrigeration units (TRUs). Overall, the proposed warehousing use

could generate an increase in criteria air pollutant emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ from trucks, trucks with TRUs, and off-road equipment that could cause an exceedance or contribute to the continuing exceedance of the federal and state AAQS in the SoCAB. Therefore, localized impacts from development of warehousing and light industrial are considered potentially **significant**.

Impact AIR-4: Warehousing and light industrial uses accommodated under the Proposed Project would generate onsite operational criteria air pollutant emissions from non-permitted sources that exceed the South Coast AQMD localized significance thresholds.

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

Prior to issuance of a Business License for a new tenant/business entity, the project developer/facility owner and tenant/business entity shall provide a signed document (verification document) to the County noting that the project development/facility owner has disclosed to the tenant/business entity the requirement to use only electric-powered equipment for daily operations. This verification document shall be signed by authorized agents for the project developer/facility owner and tenant/business entities and retained and posted by the Business License by the facility owner onsite. In addition, if applicable, the tenant/business entity shall provide documentation (e.g., purchase or rental agreement) to the County to verify, to the County's satisfaction, that any off-road equipment utilized will be electric-powered.

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

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

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

Significance with Mitigation: Significant and unavoidable. Implementation of Mitigation Measures AIR-4a through AIR-4c would minimize localized onsite operation-related criteria air pollutant emissions. However, because no specific warehousing or industrial development project is currently proposed and the specific operations of such facilities (e.g., number of heavy-duty truck trips, location of facility, etc.) are unknown, the associated emissions, and concentrations levels cannot be determined or modeled. Thus, while implementation of mitigation would reduce emissions, future warehousing and industrial land uses could still exceed the South Coast AQMD LSTs. Therefore, Impact AIR-4 would remain **significant and unavoidable**.

Health Risk: TACs

Permitted Stationary Sources

Various industrial and commercial processes (e.g., manufacturing, dry cleaning) allowed under the proposed land use plan would be expected to release TACs. Industrial land uses, such as chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities, have the potential to be substantial stationary sources that would require a permit from South Coast AQMD. The Proposed Project would not accommodate these types of uses that are associated with generating a substantial amount TACs. Although the Proposed Project could accommodate commercial land uses such as restaurants with char broilers, cafes with roasters, or buildings with an emergency generator, these sources are not considered to be large emitters. Furthermore, these types of stationary sources are subject to South Coast AQMD's new source review through their permitting requirements and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under South Coast AQMD Rule 1401. The permitting process ensures that stationary source emissions would be below the South Coast AQMD significance thresholds of 10 in a million cancer risk and 1 for acute risk at the maximally exposed individual. In addition, while the Proposed Project could develop a central utility plant to serve and provide power to the campus, the potential emissions of TACs associated with the plant equipment would also be controlled by the South Coast AQMD new source review permitting process under Rule 1401. Therefore, impacts associated with permitted stationary sources would be **less than significant**.

Nonpermitted Sources

Similar for criteria air pollutants, mobile sources of TACs are also not regulated by South Coast AQMD. The proposed warehousing and light industrial uses accommodated by the Proposed Project could also generate substantial DPM emissions from onsite truck operation, truck idling, TRUs (if cold storage permitted) and operation of off-road equipment (e.g., forklifts) used in daily business operations. Overall, these sources could generate an increase in diesel particulate matter that would contribute to cancer and noncancer health risk in the SoCAB. However, similar to evaluating localized impacts from criteria air pollutants, until a specific warehousing or light industrial development project is proposed, the associated emissions, concentrations, and health risk levels cannot be determined or modeled. Therefore, health risk impacts from development of warehousing and light industrial uses are considered potentially **significant**.

Impact AIR-5: Warehousing and light industrial uses accommodated under the Proposed Project would generate onsite operational TAC emissions from non-permitted sources that exceed the South Coast AQMD localized significance thresholds.

Mitigation: Implement Mitigation Measures AIR-4a through AIR-4c.

Significance with Mitigation: Significant and unavoidable. Implementation of Mitigation Measures AIR-4a through AIR-4c would minimize localized onsite operation-related TAC emissions. However, because no specific warehousing or industrial development project is currently proposed and the specific operations of such facilities (e.g., number of heavy-duty truck trips, location of facility, etc.) are unknown, the associated emissions, and health risk levels cannot be determined or modeled. Thus, while implementation of mitigation would reduce emissions, future warehousing and industrial land uses could still exceed the South Coast AQMD health risk thresholds. Therefore, Impact AIR-5 would remain **significant and unavoidable**.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the State one-hour standard of 20 ppm or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse in the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hot spots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. The SoCAB has been designated in attainment of both the National and California AAQS for CO.

The potential for the Proposed Project to cause or contribute to CO hotspots is evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by South Coast AQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Proposed Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at project intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required. CO levels in the Project Site area are below the National and California AAQS because the county portion of the SoCAB is designated as attainment. The Project Site area is within SRA 1. Maximum CO levels for SRA 1 in the last three years (2022 to 2024) are 1.4 to 1.8 ppm (1-hour average) and 1.2 to 1.6 ppm (8-hour average) (South Coast AQMD 2025c). CO levels decreased dramatically in California with the introduction of the catalytic converter in 1975. Furthermore, CO emissions from vehicles have substantially declined compared to 2003-era vehicles based on improved vehicle emissions standards and are presumed not to exceed the applicable thresholds. No exceedances of CO have been recorded at monitoring stations in the SoCAB since 2003 (South Coast AQMD 2022). Thus, it is not expected that CO levels at roadway intersections would rise to the level of an exceedance of these standards.

Additionally, South Coast AQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the air basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long

Beach Boulevard and Imperial Highway. In the 2003 AQMP, South Coast AQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be up to 7.0 ppm (1-hour average) and 5.2 ppm (8- hour average). Based on the intersection volumes identified at these modeled intersections, if a project's traffic levels exceed 100,000 vehicles per day at any project impacted intersection, there would be the potential for a significant impact, and dispersion modeling would need to be conducted to determine the project level impact.

Table 3.2-17, *Peak Hour Roadway Segment Volumes*, shows the peak hour segment volumes for various roadway segments within the traffic study area for the Proposed Project. Based on the peak hour volumes shown for the Cumulative+Project scenario, it is not anticipated that the Proposed Project would generate peak roadway intersection volumes that would exceed the 100,000 vehicles per day modeled in South Coast AQMD's 2003 AQMP CO attainment demonstration. This comparison demonstrates that the Proposed Project would not contribute considerably to the formation of CO hotspots, and no further CO analysis is required. Therefore, implementation of the Proposed Project would result in CO hotspot impacts that would be **less than significant**.

Table 3.2-17 Peak Hour Roadway Segment Volumes

Roadway Segment	Existing		Cumulative Base		Cumulative+Project	
	EB	WB	EB	WB	EB	WB
AM Hour						
Zonal Avenue between Mission Road and Charlotte Street	640	435	735	500	790	710
Marengo Street between Lord Street and N State Street	568	1,659	645	1,890	1,525	3,545
Charlotte Street between Cornwell Street and N Chicago Street	286	663	330	760	535	845
PM Hour						
Zonal Avenue between Mission Road and Charlotte Street	197	709	225	810	305	1,000
Marengo Street between Lord Street and N State Street	609	1,326	700	1,510	1,875	2,940
Charlotte Street between Cornwell Street and N Chicago Street	269	359	310	415	500	520

Source: Fehr and Peers.

Notes: EB = eastbound; WB = westbound

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

Construction

Potential sources that may emit odors during construction activities include architectural coatings and solvents in addition to equipment exhaust. South Coast AQMD Rule 1113, Architectural Coatings, limits the amount of VOCs from architectural coatings and solvents. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Airborne Toxic Contral Measures, adopted in 2004, that limits diesel-fueled commercial vehicle idling to five minutes at any given location. Furthermore, noxious odors would be confined to the immediate vicinity of the construction equipment. Based on the characteristics of diesel exhaust emissions, any odors from operation of diesel-powered off-road equipment would dissipate within 300 feet (CARB 2005). Additionally, off-road construction equipment would not operate in a single stationary location, but would move throughout an active construction site during construction activities. Future development accommodated under the Proposed Project would also comply with South Coast AQMD Rule 402, Nuisance, which prohibits the emission of nuisance air contaminants or odorous compounds. Therefore, impacts associated with construction-generated odors from future development of the Proposed Project are considered **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

Industrial Uses

The light and hybrid industrial uses permitted under the Proposed Project, such as light food and drink manufacturing, have the potential to generate objectionable odors. In general, industrial land uses associated with the Proposed Project would be required to comply with South Coast AQMD Rule 402. However, additional measures may be necessary to prevent an odor nuisance. Therefore, industrial land uses accommodated under the Proposed Project may generate a potentially **significant** odor impact to a substantial number of people.

Residential and Commercial Uses

Residential and commercial land uses could result in generation of odors such as exhaust from landscaping equipment. However, unlike industrial land uses, these land uses are not considered potential generators of odor that could affect a substantial number of people.

Therefore, impacts from potential odors generated from residential and commercial land uses associated with the Proposed Project are considered **less than significant**.

Impact AIR-6: Operation of light industrial uses accommodated under the Proposed Project could generate odors that would affect a substantial number of people.

> **Mitigation Measure AIR-6:** Prior to discretionary approval by the County of Los Angeles, if it is determined that a development project has the potential to emit nuisance odors, an odor management plan shall be prepared by the Project Applicant(s) and submitted to the Los Angeles County Department of Regional Planning for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to:
>
> - Wastewater treatment plants
> - Composting, green waste, or recycling facilities
> - Fiberglass manufacturing facilities
> - Painting/coating operations
> - Large-capacity coffee roasters
> - Food-processing facilities
>
> The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors and be submitted to the County. The Odor Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be incorporated into the project's design and on-site plan(s).

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure AIR-6 would ensure that odor impacts are minimized and facilities would comply with South Coast AQMD Rule 402. Therefore, Impact AIR-6 would be reduced to **less than significant**.

3.2.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative air quality impacts consists of the SoCAB. This is the same cumulative study area identified in the 2014 Master Plan

EIR. As stated, in accordance with the South Coast AQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects in the local area include new development and general growth in the project area. Refer to Table 3-2, *Cumulative Projects List*, in Chapter 3, *Environmental Analysis*, of this Draft SEIR for the full list of 13 cumulative projects. The SoCAB is nonattainment for ozone, PM_{10}, and $PM_{2.5}$. Due to the extent of the area potentially impacted by cumulative project emissions (i.e., the SoCAB), the South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the South Coast AQMD regional emissions thresholds shown in Table 3.2-5, *South Coast AQMD Regional Significance Thresholds*. Conversely, projects that do not generate emissions exceeding the South Coast AQMD regional emissions thresholds are considered to not be cumulatively significant (South Coast AQMD 2003b).

Would the project have a cumulative effect related to air quality?

Air Quality Plan

Construction and Operation

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, conflict with an applicable air quality plan. With respect to air quality, cumulative impacts are evaluated on a regional basis because air pollutants are not confined to project boundaries.

The SoCAB is currently in nonattainment for ozone and particulate matter standards. The applicable AQMP, prepared by the South Coast AQMD, incorporates population, housing, and employment growth projections developed by the SCAG. These projections are used to forecast future emissions and to develop control strategies to attain state and federal air quality standards.

Projects that are consistent with SCAG growth projections and AQMP control measures are considered to be consistent with the regional air quality planning framework and would not contribute substantially to cumulative air quality impacts. As discussed in impact discussion (a), the Proposed Project is consistent with the applicable AQMP growth assumptions and would not conflict with or obstruct implementation of AQMP control strategies.

The Proposed Project's incremental contribution to cumulative air quality impacts would not be cumulatively considerable. Therefore, cumulative impacts related to conflicts with an applicable air quality plan would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Criteria Pollutants and Exposure to Sensitive Receptors

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in a net increase in a criteria pollutant(s) and/or expose sensitive receptors to a criteria pollutant(s) during construction. With respect to air quality, cumulative impacts are evaluated on a regional basis because air pollutants are not confined to project boundaries.

The SoCAB is designated nonattainment for O_3, $PM_{2.5}$, and lead (County of Los Angeles only) under the California and National AAQS and nonattainment for NO_2 and PM_{10} under the California AAQS.[16] Construction of cumulative projects would further degrade the regional and local air quality. Air quality would be temporarily impacted during construction activities. As discussed above in impact discussion (b) and impact discussion (c), future development facilitated by implementation of the Proposed Project may result in regional and localized emissions that could exceed the South Coast AQMD significance thresholds during construction. In addition, construction activities associated with the development of individual projects under the Proposed Project may exceed cancer risk significance thresholds Therefore, the cumulative impact would be **potentially significant**.

Impact AIR-7: **The Proposed Project's construction activities have the potential to result in cumulative air quality impacts related to criteria pollutant emissions during construction.**

Mitigation: Implement Mitigation Measures AIR-1a and 1b.

Significance with Mitigation: Less than significant. As stated, under South Coast AQMD methodology, project-level impacts also represent cumulative impacts. The cumulative impact determination above is based on the project-level significance with mitigation determination. Thus, no additional mitigation measures beyond Mitigation Measure AIR-1a and AIR-1b are identified and the significance with mitigation determination accounts for all the potential reductions associated with the identified mitigation measures. However, because Impact AIR-1 would be reduced to less than significant with implementation of mitigation, Impact AIR-7 with implementation of mitigation would also be reduced to **less than significant**.

[16] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM_{10} standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California's request to redesignate the South Coast PM_{10} nonattainment area to attainment of the PM_{10} National AAQS, effective on July 26, 2013.

Operation

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in a net increase in a criteria pollutant(s) and/or expose sensitive receptors to a criteria pollutant(s) during operation. With respect to air quality, cumulative impacts are evaluated on a regional basis because air pollutants are not confined to project boundaries.

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional and/or cancer risk threshold values is not considered a substantial source of air pollution by the South Coast AQMD and does not add significantly to a cumulative impact. As discussed above in impact discussion (b) and impact discussion (c), future development facilitated by implementation of the Proposed Project may result in operational emissions that could exceed the South Coast AQMD significance thresholds. Therefore, the cumulative impact would be potentially **significant**.

Impact AIR-8: The Proposed Project's operation-related activities have the potential to result in cumulative air quality impacts related to criteria pollutant emissions during operation.

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

Significance with Mitigation: Significant and unavoidable. As stated, under South Coast AQMD methodology, project-level impacts also represent cumulative impacts. The cumulative impact determination above is based on the project-level significance with mitigation determination. Thus, the significance with mitigation determination accounts for all the potential reductions associated with the identified mitigation measures. Therefore, Impact AIR-8 would remain **significant and unavoidable**.

Odors

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in other emissions, such as odors, that adversely affect a substantial number of people during construction. With respect to air quality, cumulative impacts are evaluated on a regional basis because air pollutants are not confined to project boundaries.

Construction activities associated with the Proposed Project would generate temporary and intermittent odors from equipment exhaust, architectural coatings, and asphalt paving. These odors would be short-term in nature and would disperse rapidly with distance from the construction site. Additionally, construction activities would be subject to South Coast AQMD

rules and regulations that limit VOC content in paints and coatings, which reduces odor potential.

While nearby related projects could also generate temporary construction-related odors, such impacts would be intermittent and geographically dispersed. Given the short-term duration and limited spatial extent of construction odors, as well as regulatory compliance, the Proposed Project's contribution to cumulative odor impacts during construction would not be cumulatively considerable. Therefore, cumulative odor impacts during construction would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in other emissions, such as odors, that adversely affect a substantial number of people during operation. With respect to air quality, cumulative impacts are evaluated on a regional basis because air pollutants are not confined to project boundaries.

Operational odor impacts are typically associated with certain industrial processes. As such, the Proposed Project has the potential to generate odors during operation. Therefore, the Proposed Project has the potential to result in a cumulative contribution to odor impacts. Therefore, impacts would be potentially **significant**.

Impact AIR-9: The Proposed Project's operation-related activities have the potential to result in cumulative air quality impacts related to odors.

Mitigation: Implement Mitigation Measure AIR-6.

Significance with Mitigation: Less than significant. Mitigation Measure AIR-6 would ensure that odor impacts are minimized and facilities would comply with South Coast AQMD Rule 402. Therefore, with compliance with regulatory requirements and implementation of Mitigation Measure AIR-6, the Proposed Project's operational odor impacts would be reduced to less than significant levels. Thus, with mitigation, cumulative impacts would be **less than significant**.

3.2.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.2.4, *Project Impact Analysis*, and 3.2.5, *Cumulative Impact Analysis*, the Proposed Project would result in the following determinations:

- Would be consistent with the 2022 AQMP and result in less than significant impacts (construction and operation).

- Result in less than significant regional emissions for construction with implementation of mitigation.
- Result in significant and unavoidable regional emissions impacts for operation even with implementation of mitigation.
- Result in less than significant impacts for localized impacts related to TAC emissions generated from Project-related construction activities and less than significant impacts with mitigation implemented for localized impacts related to criteria air pollutant generated from Project-related construction activities.
- Result in less than significant CO hotspot impacts.
- Result in significant and unavoidable localized impacts related to criteria air pollutant and TAC emissions generated from operation of non-permitted land uses such as warehousing and light industrial uses even with implementation of mitigation.
- Result in less than significant construction-related odor impacts.
- Result in less than significant operation-related odor impacts with mitigation for operation of light industrial that could be accommodated by the Proposed Project.

AQMP CONSISTENCY

The 2014 Master Plan EIR concluded that the 2014 Master Plan would be consistent with the AQMP and result in a less than significant impacts without mitigation. Similarly, the Proposed Project would also be consistent and not conflict with AQMP and would result in a less than significant impact. Thus, the Proposed Project would not result in new or greater impacts compared to impacts identified in the 2014 Master Plan EIR.

REGIONAL EMISSIONS IMPACTS

For regional emissions impacts, the 2014 Master Plan EIR determined less than significant operation-related impacts without mitigation, and less than significant construction-related impacts with implementation of mitigation. As stated, the Proposed Project would result in significant and unavoidable operation impacts even with incorporation of mitigation. However, the Proposed Project would result in less than significant construction impacts with incorporation of mitigation. The prescribed Proposed Project construction mitigation measures generally utilize the mitigation identified in the 2014 Master Plan EIR with some revisions and additions. The revisions include requiring Tier 4 Final emissions standards over the previous Tier 4 Interim standards to reflect the implementation schedule for the Tier 4 Final standards and the current greater availability of Tier 4 Final equipment compared to year 2014. An addition include restricting the number of daily haul truck trips. Overall, the Proposed Project would not result in greater or new significant impacts for construction compared to the impacts identified in the 2014 Master Plan EIR. However, it would result in greater or new significant impacts for operation compared to the impacts identified in the 2014 Master Plan EIR due to the overall greater scale of development proposed and the resulting emissions. Table 3.2-18, *Maximum*

Daily Regional Emissions Comparison to the 2014 Master Plan, compares the regional construction and operational emissions for the 2014 Master Plan as quantified in the 2014 Master Plan EIR to the emissions estimated for the Proposed Project. As shown in the table, the Proposed Project would generally result in greater maximum daily construction emissions and net operational emissions compared to the 2014 Master Plan.

Table 3.2-18 Maximum Daily Regional Emissions Comparison to the 2014 Master Plan

Scenario	Criteria Air Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction[1]						
2014 Master Plan EIR	50	82	280	1	34	12
Proposed Project	54	92	361	1	84	21
Net Difference	4	10	81	<1	50	9
Net Difference (%)	8%	12%	29%	<1%	147%	75%
Operation[2]						
2014 Master Plan EIR Project Net Emissions[3]	12	(88)	(318)	1	26	12
Proposed Project Net Emissions	259	129	1,457	3	351	94
Net Difference	**247**	**217**	**1,775**	**2**	**325**	**82**
Net Different (%)	2,056%	247%	558%	239%	1,250%	680%

Notes: ()=negative value.

1. Emissions with mitigation incorporated.
2. Emissions shown are for the unmitigated scenario.
3. The emissions shown represent the net increase in emissions associated with implementation of the 2014 Master Plan as disclosed in the 2014 Master Plan EIR.

LOCALIZED EMISSIONS IMPACTS

The 2014 Master Plan EIR determined less than significant localized impacts from operational activities without mitigation necessary. For the Proposed Project, it would result in less than significant localized emissions impacts associated CO hotspots and permitted facilities. However, the Project would result in significant and unavoidable operation-related localized impacts for TACs and criteria air pollutants associated with non-permitted facilities even with mitigation incorporated. Therefore, overall, the Proposed Project would result in new or greater operation-related localized impacts compared to the impacts identified in the 2014 Master Plan EIR.

The 2014 Master Plan EIR determined less than significant construction-related health risk impacts without mitigation. However, localized impacts from exposure to construction-related

emissions of PM_{10} and $PM_{2.5}$ were determined to be significant and unavoidable even with incorporation of mitigation. For the Proposed Project, localized impacts associated with Project construction-related emissions of TACs would be less than significant. Localized impacts related to Proposed Project construction-related criteria air pollutant emissions would be less than significant with mitigation. Additional mitigation, such as restricting the number of daily haul truck trips, is prescribed for the Proposed Project compared to the mitigation identified in the 2014 Master Plan EIR to provide greater reductions in NO_X emissions. Therefore, the Proposed Project would not result in greater impacts compared to the impacts identified in the 2014 Master Plan EIR.

ODOR IMPACTS

The 2014 Master Plan EIR determined less than significant impacts for construction and operation-related odors without the need for mitigation. For the Proposed Project, it would result in less than significant operation-related odor impacts with mitigation incorporated and less than significant construction-related odor impacts. Mitigation is prescribed to address potential operation-related odors due to the types of industrial uses that would be permitted under the Proposed Project, which include food and drink production in addition to cosmetic and pharmaceutical manufacturing.

Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.3 BIOLOGICAL RESOURCES

This chapter of the Draft SEIR discusses the potential for biological resources to occur within the Project Site. This chapter also identifies potential biological resources impacts that could result from future development associated with the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, no comments were received regarding impacts to biological resources associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*.

Preparation of this analysis was informed by:

- *Biological Resources Report Los Angeles County General Medical Center Healthy Village Project*, ENVICOM Corporation, April, 2026. (Appendix D of this Draft SEIR)

3.3.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) was enacted in 1918. Its purpose is to prohibit killing or transporting native migratory birds or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA. The list of migratory bird species that are protected by the MBTA is maintained by the U.S. Fish and Wildlife Service (USFWS), which regulates most aspects of the taking, possession, transportation, sale, purchase, barter, exportation, and importation of migratory birds. Under the MBTA, "take" means to kill, directly harm, or destroy individuals, eggs, or nests or to otherwise cause failure of an ongoing nesting

effort. Permits are available under the MBTA through USFWS, and authorization for potential take under MBTA is addressed as part of the federal Endangered Species Act (ESA) Section 7 consultation process.

The Proposed Project must be analyzed to ensure consistency with the MBTA, including avoidance of take with respect to nesting birds, their eggs, or activities that may cause nest failure. This applies to all migratory species protected under the MBTA that may be directly or indirectly affected by a project. Any potential take must be either avoided or minimized through mitigation measures or permitted through consultation with USFWS (USFWS 2025a).

Federal Endangered Species Act

The federal ESA was enacted in 1973 to protect threatened and endangered species and their associated ecosystems. “Take” of a listed species is prohibited except when specific authorization has been granted through a USFWS permit under Sections 4(d), 7, or 10(a) of the ESA. “Take” is defined as to harass, harm, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any of these activities without a permit (USFWS 2025b).

Clean Water Act

In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the Clean Water Act (CWA), which regulates the discharge of pollutants into the waters of the United States. Under Section 404, permits need to be obtained from the U.S. Army Corps of Engineers (USACE) for the discharge of dredged or fill material into jurisdictional waters of the United States. USACE-regulated activities under Section 404 involve a discharge of dredged or fill material, including, but not limited to, grading, placing of riprap for erosion control, activities that generally do not involve a regulated discharge (if performed specifically in a manner that avoids discharges) including driving pilings, some drainage channel maintenance activities, constructing temporary mining and farm/forest roads, and excavating without stockpiling. USACE issues Nationwide Permits for activities that require discretionary authority and do not exceed specific impact requirements (e.g., less than 0.5 acre of impacts, no impacts on special aquatic sites, etc.). USACE requires individual permits for activities that exceed the requirements of Nationwide Permits.

Under Section 401 of the CWA, Water Quality Certification from the State Water Resources Control Board and Regional Water Quality Control Board needs to be obtained if an action could result in any impacts on jurisdictional waters of the United States (EPA 2025).

STATE

California Endangered Species Act

The California ESA authorizes the California Fish and Game Commission to designate endangered, threatened, and rare species and regulate the taking of these species (California Fish and Game Code Sections 2050–2098). The act defines "endangered" species as those whose continued existence in California is jeopardized. State-listed "threatened" species are those that are not presently facing extinction but may become endangered in the foreseeable future.

Section 2080 of the California Fish and Game Code prohibits the taking of state-listed plants and animals. The California Department of Fish and Wildlife (CDFW) also designates "fully protected" or "protected" species as those that may not be taken or possessed without a permit from the California Fish and Game Commission and/or CDFW. Species that have been designated as fully protected or protected may or may not be listed as endangered or threatened (CDFW 2025a).

California Fish and Game Code

The California Fish and Game Code (CFGC) is regulated by the California Fish and Game Commission, as authorized by Article IV, Section 20, of the Constitution of the State of California. Sections 3503, 3503.5, 3505, 3800, and 3801.6 of the California Fish and Game Code protect all native birds, birds of prey, and all nongame birds, including their eggs and nests, that occur naturally within the state that are not already listed as fully protected. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (e.g., hawks, owls, eagles, falcons), including their nests or eggs. CDFW's Lake and Streambed Alteration Program (Sections 1600–1607) requires any person who proposes a project that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake or use materials from a streambed to notify the CDFW before beginning the project (CFGC 2025a).

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was enacted in 1977. It allows the California Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of plants that are designated as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations, emergencies, and, after properly notifying CDFW, vegetation removal from canals, roads, and other sites, changes in land use, and certain other situations.

A consortium of scientists, botanists, and enthusiasts, the California Native Plant Society (CNPS) has a mission to review and categorize native plants in California. The resulting list of sensitive

plant species produced by CNPS can be above and beyond the federal and state lists of threatened and endangered species. CNPS rankings can therefore be used as a criterion for environmental review in the CEQA process. If a property has suitable habitat, CEQA may require analysis of all CNPS Rank 1B, Rank 2, Rank 3, and Rank 4 plants that could occur in the vicinity. Surveys should be completed in accordance with CDFW and CNPS protocols during the plant species' blooming period to stand up to rigorous environmental review (CDFW 2024).

Natural Community Conservation Planning Act

The Natural Community Conservation Planning Act (NCCPA) allows for the development of broad-based ecosystem-level plans for the protection and perpetuation of biological diversity. The primary objective of Natural Community Conservation Plans prepared under the NCCPA is to conserve natural communities at the ecosystem level while accommodating compatible land use. Although plants that are protected under an approved Natural Community Conservation Plan may be "taken" by activities that are covered under the plan, they typically receive a high level of conservation and protection (CFGC 2025b).

LOCAL

County of Los Angeles General Plan

The Conservation and Natural Resources Element of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) was updated in 2015 (County of Los Angeles 2015). The Conservation and Natural Resources Element guides the long-term conservation of natural resources and preservation of available open space areas and includes policies to aid in the conservation and preservation of natural resources. Applicable policies from the Conservation and Natural Resources Element include:

- **Policy C/NR 3.1.** Conserve and enhance the ecological function of diverse natural habitats and biological resources.
- **Policy C/NR 3.8:** Discourage development in areas with identified significant biological resources, such as SEAs.
- **Policy C/NR 3.10.** Require environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, and permanently preserve mitigation sites.
- **Policy C/NR 3.11.** Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities.

County of Los Angeles Significant Ecological Areas

As part of the general plan's Conservation/Open Space and Land Use Elements, the County has identified and adopted policies for Significant Ecological Areas (SEAs), which represent a wide variety of biological communities within the County. The SEAs are intended to preserve and

protect regional biodiversity; however, SEAs do not preclude limited compatible development (County of Los Angeles 2025). The Project Site is not within a defined County SEA.

County of Los Angeles Oak Tree Ordinance

The County of Los Angeles County Oak Tree Ordinance (County of Los Angeles Ordinance Section 22.174.040) requires an Oak Tree Permit to be obtained to cut, destroy, remove, relocate, inflict damage, or encroach upon a protected oak tree or its protected zone. The ordinance protects any tree, shrub, or plant of the oak tree genus *Quercus* and with a diameter of 8 inches or more; for oaks with multiple trunks, a combined diameter of 12 inches or more, measured 4.5 feet above the natural grade, is required for the two largest trunks. The protected zone for oaks is defined as the area beneath the dripline or canopy of the tree plus 5 feet beyond the dripline or 15 feet from the trunk, whichever distance is greater. Impacts can include pruning or cutting the trunk to apply pesticides to a protected tree for the benefit of the tree.

There are two types of permits, administrative and discretionary. Actions that would affect one protected tree on a property with a single-family residence require an approved administrative Oak Tree Permit. Actions that would affect protected oak trees on any other type of property require a discretionary Oak Tree Permit.

Oak Tree Permit requests require the property owner to file an application with the Department of Regional Planning and provide a filing fee, an oak tree report, site plans for the property, and maps of the surrounding area (County of Los Angeles 2025b).

City of Los Angeles Municipal Code

The City of Los Angeles Protected Tree and Shrub Ordinance (Los Angeles Municipal Code Chapter 4, Article 6, Sections 46.00 through 46.06) regulates the removal, relocation, encroachment, or significant alteration of designated protected native tree species. Protected species include certain oak trees, Southern California black walnut, California sycamore, and California bay laurel trees that meet applicable size thresholds established by the City of Los Angeles Municipal Code. Projects affecting protected trees are subject to review and approval by the City (City of Los Angeles 2026).

Trees located within the public right-of-way, including street trees, are regulated by the City of Los Angeles Urban Forestry Division pursuant to applicable provisions of the City of Los Angeles Municipal Code (Chapter 6, Article 2) (City of Los Angeles 2026). Removal, relocation, pruning, or disturbance of street trees generally requires review and approval by the Urban Forestry Division (StreetsLA 2026).

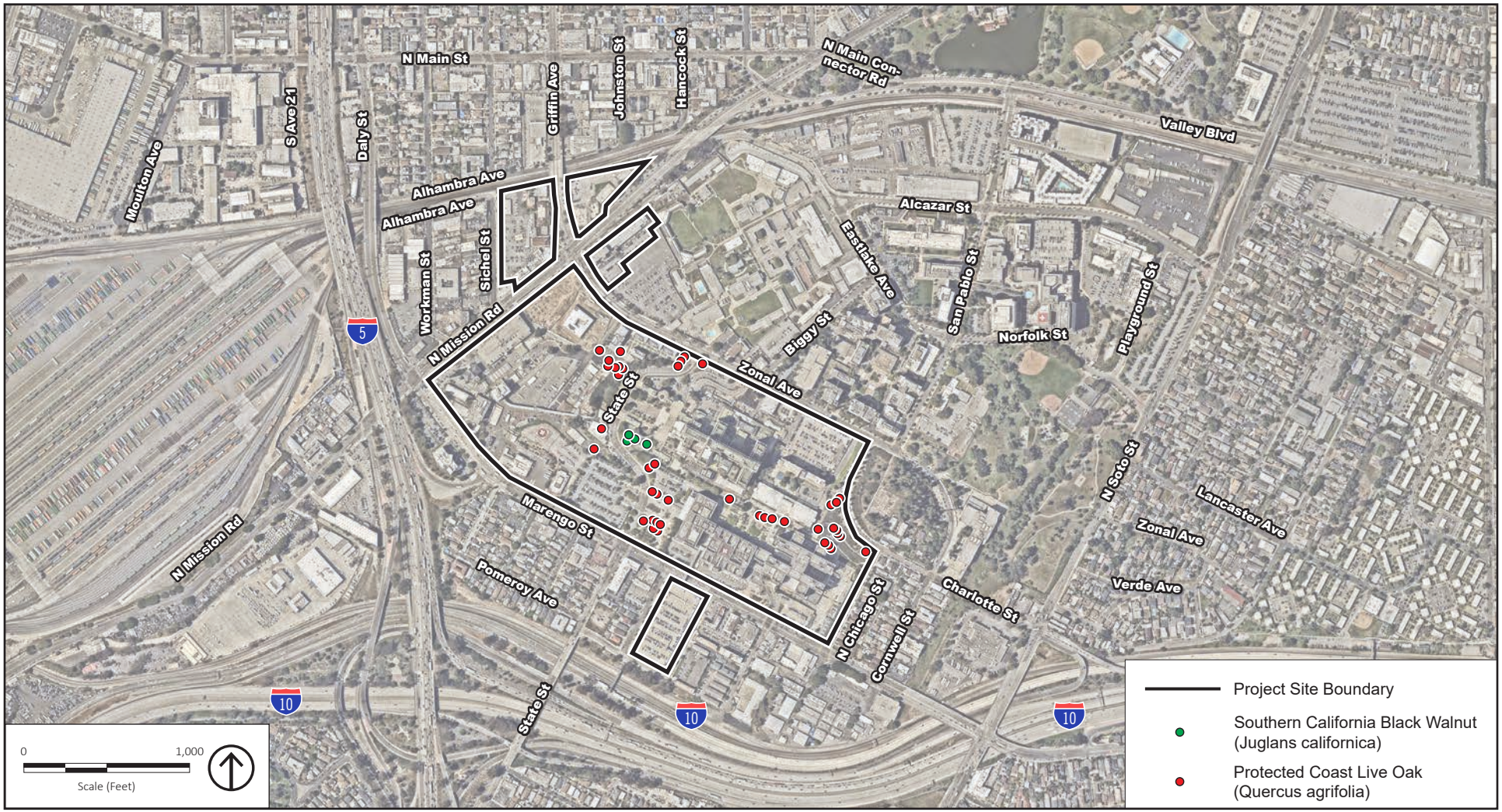
3.3.2 Existing Conditions

The Project Site is in the City of Los Angeles but is owned and maintained by the County. The Project Site is in central Los Angeles, just northeast of the intersection of the I-5 and I-10 freeways. It is entirely developed with existing structures and primarily ornamental vegetation and does not support any native vegetation communities. The topography on-site consists of multiple pad levels and varying elevations with slopes in between. The highest elevation on the site is approximately 390 feet in the northeast portion of the Project Site (Envicom 2026 [Appendix D]). Average high/low summer temperatures for the area are 84 degrees Fahrenheit (°F)/66°F, respectively, and high/low winter temperatures are 68°F/49°F, respectively (Envicom 2026 [Appendix D]). The surrounding area is developed with a mix of urban land uses, including but not limited to residential, industrial, and commercial properties. Several public parks are in the general vicinity of the Project Site, with Hazard Park and Lincoln Park, both of which can be accessed from existing surrounding streets, being the closest open space areas to the Project Site (230 feet east and 0.27 mile from the Project Site, respectively). A full list of parks and recreational facilities can be seen in Table 3.14-1, *Parks and Recreational Facilities Within One Mile of Project Site* in Section 3.14, *Recreation*.

SPECIAL-STATUS PLANT SPECIES AND SENSITIVE NATURAL COMMUNITIES

Given the developed nature of the Project Site, most special-status plant species known to occur in the region are not expected to occur on the Project Site due to a lack of suitable habitat or woodland habitat. While most of the trees on-site are ornamental, some individual native coast live oak (*Quercus agrifolia*) and southern California black walnut (*Juglans californica*) trees exist within the Project Site that are interspersed with ornamental species in established landscaped areas (Envicom 2026). According to Figure 3.3-1, *Tree Survey Map*, the Project Site includes 42 coast live oak and 4 southern California black walnut.

Figure 3.3-1 - Tree Survey Map



Source: Envicom 2025.

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Individual native shrub species such as white sage (*Salvia apiana*), coyote brush (*Baccharis pilularis*), and yarrow (*Achillea*) have been planted as ornamentals in various areas throughout the Project Site but do not constitute native habitat. Common native species known to urban areas were also observed, including giant horseweed (*Erigeron canadensis*) and common sunflower (*Helianthus annuus*). As such, no native vegetation communities or areas that could be reasonably classified as a California Natural Community exist on the Project Site (Envicom 2026). The literature review of the Project Site revealed that seven sensitive natural communities have been reported in the Los Angeles Quadrangle area or within adjacent quadrangles:

- California Walnut Woodland
- Open Engelmann Oak Woodland
- Riversidian Alluvial Fan Sage Scrub
- Southern Coast Live Oak Riparian Forest
- Southern Cottonwood Willow Riparian Forest
- Southern Sycamore Alder Riparian Woodland
- Walnut Forest

None of the above-listed communities were identified on the Project Site (Envicom 2026).

See Appendix 3 in Appendix D, *Biological Resources Report*, to this Draft SEIR for full list of special-status plant species and their potential for occurrence.

SPECIAL-STATUS WILDLIFE

Nesting Birds

On-site vegetation could support nesting habitat for several special-status species of birds, most of which are common to the site and the region. These include the tricolored blackbird (*Agelaius tricolor*), Swainson's hawk (*Buteo swainsoni*), Cooper's hawk (*Accipiter cooperii*), and black swift (*Cypseloides niger*). The only species that has a moderate potential to occur on-site is Cooper's hawk, which is a common urban raptor species. This species could potentially nest on-site in trees and would be protected under the MBTA and California Code of Regulations while nesting (Envicom 2026).

Mammals

As identified in Appendix D, none of the CNDDB-identified special-status species would potentially occur at the Project Site. Most of these records are from over a century ago and some of them are presumed extirpated. The habitat and conditions necessary to support these species are absent from the Project Site.

The 2014 Master Plan EIR determined that, although unlikely, several bat species considered California Species of Concern could occur on the Project Site due to limited foraging and roosting potential, including the possibility of Western yellow bats roosting in on-site palm trees. These bat species could still occur on the Project Site and could include pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), western yellow bat (Lasiurus xanthinus), and big free-tailed bat (*Nyctinomops macrotis*). Though unlikely, there is some potential for pallid bat and yellow bat to roost in crevices or cavities of either trees and/or buildings and for western mastiff bat to roost in crevices or cavities of on-site buildings (Envicom 2026). Big free-tailed bat would only potentially forage over the Project Site but would not roost because the site lacks suitable roosting habitat. See Appendix 5 of Appendix D to this Draft SEIR for full list of special-status wildlife species and their potential for occurrence.

WILDLIFE MOVEMENT CORRIDORS AND HABITAT LINKAGES

Habitat linkages are physical connections that allow wildlife to move between areas of suitable habitat in both undisturbed and fragmented landscapes. These can be critical at both the local and regional level. Habitat linkages are necessary not only to access essential resources, such as water sources or habitat for foraging, breeding, or cover, but also for dispersal and migration, to ensure the mixing of genes between populations, and so wildlife can respond and adapt to environmental stress and thus are necessary to maintain healthy ecological and evolutionary processes. Wildlife corridors are areas of open space of sufficient width to permit the movement of larger, mobile species to move from one major open space region to another. Regional habitat linkages are larger wildlife corridors or regions of connectivity that are important for movement of multiple species and maintenance of ecological processes at a regional scale (Envicom 2026 [Appendix D]).

Wildlife crossings are generally small, narrow areas allowing wildlife to pass through an obstacle or barrier, such as a roadway, to reach another patch of habitat. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, or open areas with little vegetative cover. Examples of wildlife crossings include culverts, drainage pipes, underpasses, and tunnels (Envicom 2026 [Appendix D]).

The Project Site is highly developed and presents a number of obstacles and barriers to wildlife movement. As such, the Project Site is not within an area that has been identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor (Envicom 2026 [Appendix D]). Additionally, the Project Site does not overlap with any County-designated SEAs (Envicom 2026 [Appendix D]).

According to Figure 9.2, Regional Habitat Linkages, of the LA County General Plan 2035 Conservation and Natural Resources Element, the Project Site is not in a regional wildlife linkage, an area with wildlife movement, or an area with open space (County of Los Angeles 2014a). The nearest regional wildlife linkage is approximately 11 miles north of the Project Site

in the Angeles National Forest. Additionally, the California Department of Fish and Wildlife's Terrestrial Habitat Connectivity map indicates that the Project Site is in an area categorized with limited connectivity opportunity (CDFW 2025b), that is, areas where land use limits options for providing connectivity (e.g., agriculture, urban) or no connectivity importance has been identified in scientific models (CDFW 2025c).

JURISDICTIONAL RESOURCES

The USFWS National Wetland Inventory does not identify any streams, drainages, or other jurisdictional features on the Project Site, including wetlands, jurisdictional waters, or riparian areas (Envicom 2026). The nearest potentially jurisdictional feature is located approximately 0.40-mile northeast of the Project Site, within Lincoln Park.

3.3.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section IV, states that the Proposed Project would result in a significant impact on biological resources if it would:

a) Have a substantial 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.

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.

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

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.

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

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

METHODOLOGY

Literature Review

A literature review was performed by Envicom Corporation in preparation for field surveys that included information available in standard biological references and relevant lists and databases pertaining to the status and known occurrences of sensitive and special-status resources. Other sources of information included aerial photographs, topographic maps, soil survey maps, climate data, and relevant policy and planning documents. Additionally, a review of the California Department of Fish and Wildlife's Natural Diversity Database (CNDDB) Rarefind 5 application was used to determine the potential for occurrence for sensitive plant communities/habitats. Results of the literature review are documented in this section and can be viewed in the Biological Resources Report in Appendix D.

Field Surveys

Biological surveys of the Project Site were conducted by Envicom biologists in June and July of 2025. The surveys involved a search for protected and regulated biological resources, including rare, threatened, and endangered plant and wildlife species; special habitats; sensitive natural communities; jurisdictional waters and riparian habitat; and locally sensitive resources and evaluated the importance of the site for wildlife movement. The area surveyed included the entire extent of the Project Site. Areas of the Project Site that were inaccessible on foot were reviewed via aerial imagery and/or from a distance using binoculars to determine whether they contained special-status biological resources.

The surveys were performed by traversing the Project Site on foot. This methodology resulted in a thorough investigation of the plant communities and habitat types on the Project Site. An inventory of plants and wildlife observed was recorded, with species identified to the taxonomic level necessary to determine their status. Plant species determinations were made using the *Jepson Manual: Vascular Plants of California* (2nd ed.). Natural community classifications were correlated with the *Manual of California Vegetation* and the *California Natural Communities List*. Wildlife species observed at and in the vicinity of the site were identified by direct observation, sign (e.g., tracks, scat, or burrows), or vocalization. Wildlife species identification relied upon wildlife field guides. Additionally, photographs were taken as a record of Project Site conditions at the time of the survey. Results of the biological field surveys are documented throughout Section 3.3.4*, Project Impact Analysis*, of this chapter and can be found in Appendix D of this Draft SEIR.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes. Analysis of the Proposed Project is in Section 3.3.4, *Project Impact Analysis*, and 3.3.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant and unavoidable impacts to any species identified as a candidate, sensitive, or special-status species; substantial interference 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; or conflict with any local policies or ordinances to protect biological resources, such as a Tree Preservation Policy or Ordinance. Additionally, the 2014 Master Plan EIR concluded that the 2014 Master Plan would have no impacts on federally protected wetlands. Table 3.3-1, *Summary of Biological Resources Impact Conclusions in the 2014 Master Plan EIR*, provides an overview of previous impacts on biological resources analyses for the Campus.

Table 3.3-1 Summary of Biological Resources Impact Conclusions in the 2014 Master Plan EIR

Significance Criteria[1]	Significance without Mitigation	Mitigation Measure[2]	Significance with Mitigation
BIO-1: Would implementation of the Proposed Project 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 CDFW or USFWS?	Potentially Significant (construction) Less Than Significant (operation)	MM-BIO-1	Less Than Significant (construction and operation)
BIO-2: Would implementation of the Proposed Project have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the CWA,	No Impacts	None	No Impacts

Table 3.3-1 Summary of Biological Resources Impact Conclusions in the 2014 Master Plan EIR

Significance Criteria[1]	Significance without Mitigation	Mitigation Measure[2]	Significance with Mitigation
through direct removal, filling, hydrological interruption, or other means?			
BIO-3: Would implementation of the Proposed Project result in substantial interference 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?	Potentially Significant (construction and operation)	MM-BIO-2	Less Than Significant (construction and operation)
BIO-4: Would implementation of the proposed project conflict with any local policies or ordinances to protect biological resources, such as a Tree Preservation Policy or Ordinance?	Potentially Significant (construction) Less Than Significant (operation)	MM-BIO-3	Less Than Significant (construction and operation)

Source: County of Los Angeles 2014b.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.3.4 Project Impact Analysis

a) Would the project have a substantial 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?

Special-status plant species either have unique biological significance, limited distribution, restricted habitat requirements, particular susceptibility to human disturbance, or a combination of these factors. Special-status plant species are those plants listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS under the Federal Endangered Species Act (FESA); those listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act (CESA); and plants on the CNPS Inventory of Rare and Endangered Vascular Plants with a California Rare Plant Rank (CRPR) of 1A (plants presumed extirpated in California and either rare or extinct elsewhere), 1B (plants considered to be rare, threatened, or endangered species in California and elsewhere), 2A (plants presumed extirpated in California, but more common elsewhere), 2B (plants considered rare, threatened, or endangered in California, but more common elsewhere), and 3 (review list: plants about which more information is needed). CRPR 3 plants are evaluated on a case-by-case basis. Special-status plant species also include CRPR 4 species (Envicom 2026 [Appendix D]).

As part of the Biological Resources Report (Appendix D), the potential for special-status wildlife species to be present on the Project Site was evaluated. Special-status wildlife species are species that are listed or proposed for listing, or that meet the criteria for listing as endangered, threatened, or rare under the FESA or CESA, and those that are listed on the CDFW Special Animals list with a designation of SSC (California Species of Special Concern) or CFP (California Fully Protected). Bird species identified as either Los Angeles County Sensitive Bird Species or being on the Los Angeles County Bird Watchlist are also considered special status (Envicom 2026 [Appendix D]). The status codes for special-status wildlife are described in Table 2 of Appendix D.

Construction

The Project Site is centrally located in the urban City of Los Angeles and is developed with existing structures, amenities, and associated ornamental vegetation that support the Medical Center. No native vegetation communities or sensitive or special-status plant species have been documented on-site or have the potential to occur on-site due to lack of suitable habitat on the Project Site or because the Project Site is outside of the known range of the species. The Project Site does not contain the habitat, conditions, underlying abiotic characteristics, or resources necessary to support any special-status plant species (Envicom 2026 [Appendix D]). Therefore,

the Proposed Project would not have a substantial adverse effect, either directly or indirectly through habitat modification, on any special-status plant species identified as candidate, endangered, or threatened; with a CRPR rank of 1 to 3; identified as special-status in a local or regional plan, policy, or regulation; or by CDFW or USFWS.

Construction could potentially affect the southern California black walnut trees, which receive a rank of CRPR 4.2; however, these trees do not represent a regionally or locally significant population (Envicom 2026 [Appendix D]). The Proposed Project's potential impacts related to tree removal are discussed under impact discussion (e).

As previously discussed under section 3.3.2, and as identified in Appendix D, none of the CNDDB-identified special-status species would potentially occur at the Project Site. Most of these records are from over a century ago and some of them are presumed extirpated. The habitat and conditions necessary to support these species are absent from the Project Site, as confirmed by site visits by a qualified biologist.

There is some limited potential for special-status wildlife species to occur on the Project Site, including four birds and four bat species (Envicom 2026 [Appendix D]). The bird species are highly mobile and are not likely to be directly or indirectly harmed by construction activities. There is low potential for the identified bird species to nest and forage in the Project Site. The Project Site is not located within a key wildlife crossing, nor is it necessary for wildlife movement to access essential resources. It is in a highly urbanized area of central Los Angeles near major freeways and heavily trafficked roads (Envicom 2026 [Appendix D]). Potential impacts to special-status birds would be limited to potential take of active nests. Impacts to nesting birds are addressed under impact discussion (d). Special-status bats that could potentially be impacted by the Proposed Project include pallid bat, western mastiff bat, and western yellow bat, all of which are species of special concern (Envicom 2026 [Appendix D]). Pallid bat and western yellow bat would potentially roost in cavities, crevices, or exfoliating bark of on-site trees, though the potential is low. Additionally, there is a low potential for western mastiff bat to roost in cavities or crevices of on-site buildings. Potentially occurring big free-tailed bat would not be impacted by the Proposed Project because there is no suitable roosting habitat; there is only limited potential for the big free-tailed bat to forage aerially over the Project Site. Should individual development projects and implementation activities under the Proposed Project require removal of on-site trees or other potential roost sites, a potentially **significant** impact to roosting special-status bats could occur.

Impact BIO-1: During the construction phase, the Proposed Project could impact roosting special-status bats, including the pallid bat, western yellow bat, and western mastiff bat.

> **Mitigation Measure BIO-1: Mitigation for Impacts to Special-Status Bats.** To avoid impacts on roosting bats, preconstruction surveys shall be conducted by a qualified bat biologist prior to the on-set of construction within the vicinity of vacant buildings and

prior to tree removal. During surveys, biologists shall avoid unnecessary disturbance of potentially occupied roosts. Full-spectrum acoustic detectors shall be used during emergence surveys to assist in species identification. If it is determined that trees or structures in the project area are being used by bats as roost sites, the following protective measures shall be implemented:

- Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) shall not occur during the maternity period (April 15 to September 15) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost shall remain undisturbed from the time it is located until the following September 15 or until a qualified biologist has determined the roost is no longer active. No construction work shall occur at the roost or within a 100-foot buffer zone (or an alternative buffer zone, as determined by the biologist) until September 15.
- Exclusion devices may be installed outside of the maternity period (September 16 to April 14) to preclude bats from occupying buildings during, or prior to the on-set of construction. Exclusionary devices shall be installed only by or under the supervision of an experienced bat biologist. Eviction of bats roosting in trees outside the maternity season shall be done in favorable weather under the supervision of a qualified bat biologist and adhering to the following two-step removal process:
    - On Day 1, for trees with cavities, crevices, and exfoliating bark, and that are found to support roosting bats, Step 1 would be removal of branches and limbs with no cavities. These limbs shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree that may not have been detected during the preconstruction survey, will either abandon the roost immediately (rarely) or, after emergence, will avoid returning to the roost. For foliage roosting bats, Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. On Day 2, under the supervision of a qualified biological monitor familiar with the life history of subject bat species, the tree may be removed.
    - Qualified biologists should search all downed roost trees for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to the California Department of Fish and Wildlife (CDFW).

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure BIO1, which includes preconstruction surveys, emergence surveys for species identification, and protective measures if bats are found on-site, would reduce the significant impacts to special-status bats to a less-than-significant level.

Operation

There are no special-status plant species listed as rare, threatened, or endangered or with a CRPR rank of 1 to 3 on the Project Site. Furthermore, there is no potential for any such species to occur on-site (Envicom 2026 [Appendix D]). There are four southern California black walnut trees in the central part of the Project Site; however, they do not represent a locally or regionally significant population (Envicom 2026 [Appendix D]). If the southern California black walnut trees remain on-site, it is not anticipated that operational activities would have an adverse effect on these trees because implementation of the Proposed Project would not differ significantly from current operational activities.

There is some limited potential for special-status wildlife species to occur on the Project Site, including four birds and four bats. Special-status birds include tricolored blackbird, Swainson's hawk, Cooper's hawk, and black swift. Operation of the Proposed Project is not anticipated to impact nesting of these species beyond the impacts addressed under impact discussion (a) construction and impact discussion (d). Outside of nesting activities, each of these species are highly mobile and are not likely to be directly harmed during operational activities, including trimming and pruning. The special-status bat species include pallid bat, western yellow bat, and big free-tailed bat. However, as operational activities of any projects developed under the Proposed Project would not differ significantly from current operational activities, it is not expected that any of these special-status bat species would be substantially adversely impacted by operation of the Proposed Project's (Envicom 2026 [Appendix D]). Therefore, operation of the facilities and buildings proposed under the Proposed Project would not have an adverse impact on any special-status animal or plant species. Impacts of operational activities associated with Proposed Project would be considered **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project 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?

Construction

No riparian habitat or federally protected surface waters, wetlands, or other aquatic resources—as defined under Sections 401 and 404 of the CWA or CFGC Section 1600—are located within or immediately adjacent to the Project Site (Envicom 2026 [Appendix D]). The nearest identified potential jurisdictional feature is located 0.40-mile northeast of the Project Site. Additionally, projects implemented under the Proposed Project would be required to obtain and comply with a Construction General Permit through the State Water Resources Control Board. This permit and associated National Pollutant Discharge Elimination System (NPDES) requirements include development and implementation of a Stormwater Pollution Prevent Plan (SWPPP), with associated monitoring and reporting. Stormwater best management practices (BMP) would also be required to control erosion, minimize sedimentation, and control stormwater runoff that would potentially affect water quality during construction activities. Additional source-control BMPs would also be required to prevent runoff contamination from potentially hazardous materials and eliminate non-stormwater discharges. See also Section 3.9, *Hydrology and Water Quality*. Additionally, given distance of the nearest riparian or sensitive natural community from the Project Site, as well as the current fully developed condition, no impacts from construction activities of the Proposed Project are anticipated. As such, construction of the Proposed Project would not adversely affect any riparian habitat or federally protected wetlands.

As described in Section 3.3.2, *Existing Conditions*, the Project Site does not contain any sensitive natural communities. Biological surveys conducted by Envicom revealed that individual coast live oak (42 trees) and southern California black walnut (4 trees) along with white sage, coyote brush, and yarrow exist on the Project Site (Envicom 2026 [Appendix D]). Though native trees and shrubs exist on the Project Site, these individual trees and shrubs, specifically the coast live oak and southern California black walnut trees, do not provide either oak or walnut woodland habitat. Woodland habitats are generally defined as a type of wooded community characterized as having a canopy cover of 30 to 80 percent, a poorly developed understory, and a diverse herbaceous layer of forbs, grasses, and sedges with 50 to 100 percent ground cover (USDA 2008). However, the LA County General Plan 2035 Conservation and Natural Resources Element defines an oak woodland as an oak stand with a greater than 10 percent canopy cover or that may have historically supported greater than 10 percent canopy cover (County of Los Angeles 2025). Field observations indicate that these individual native trees do not provide either oak or walnut woodland habitat. As such, no sensitive natural communities exist on the Project Site

(Envicom 2026 [Appendix D]). Therefore, development of the Proposed Project would result in **no impact** on any riparian habitat or other sensitive natural community.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

As previously discussed, no riparian habitat or federally protected surface waters, wetlands, or other aquatic resources—as defined under Sections 401 and 404 of the CWA or CFGC Section 1600—are located within or immediately adjacent to the Project Site. Additionally, the Proposed Project would also be required to comply with the County's Low Impact Development requirements, which would manage and control the volume and quality of non-stormwater and stormwater discharges based on the future developed condition during the operational phase. Therefore, operation under the Proposed Project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community. **No impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

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

Construction

As stated in impact discussion (b), no federally protected wetlands are within or immediately adjacent to the Project Site (Envicom 2026 [Appendix D]). Projects implemented under the Proposed Project would be required to obtain and comply with a Construction General Permit. Therefore, development and implementation of the Proposed Project would result in **no impact** to State or federally protected wetlands.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

As previously identified, no federally protected wetlands are within or immediately adjacent to the Project Site. Therefore, under the Proposed Project's operational conditions, the Proposed Project would not result in a substantial adverse impact effect on State or federally protected wetland. **No impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

d) Would the project 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?

Construction

As stated above in Section 3.3.2, *Existing Conditions*, the Project Site is highly developed and located in an urbanized area, and presents a number of obstacles and barriers to wildlife movement (Appendix D).

As part of the Biological Resources Report (Appendix D), the potential for the Project Site to be important to wildlife movement was evaluated both in the field and by reviewing recent aerial photographs of the site and the surrounding area. Although common wildlife species could potentially move through the Project Site because it contains some vegetative cover and foraging opportunity for common wildlife species, the site is not of particular importance to wildlife movement (Envicom 2026 [Appendix D]). For example, the Project Site is not in a bottleneck of habitat between larger areas of core suitable habitat; it does not contain an important wildlife crossing; and it is not necessary for wildlife to pass through the Project Site to access essential resources for water, foraging, breeding, or cover. The Project Site is centrally located in the urban City of Los Angeles and near major freeways and frequently trafficked roads.

Additionally, the Proposed Project would not interfere with migratory fish because the Project Site does not contain any streams, drainages, or other jurisdictional features. Therefore, no impacts would occur to migratory fish.

Birds would potentially nest on the Project Site during the nesting season, including within trees, shrubs, on or in buildings, on the ground concealed in herbaceous/low-lying vegetation, and other suitable nesting features. Bird species that are resilient to background urban disturbances that currently occur, such as traffic noise, sirens, alarms, etc., would potentially nest on ledges or other features of tall buildings on the Project Site. Birds that are resilient to background urban disturbances could include the American peregrine falcon, common raven, and other birds common to urban areas.

While nesting, nearly all species of birds would be protected by the federal MBTA and/or CFGC Sections 3503 and 3503.5. Removal of vegetation and the demolition of buildings during construction, if conducted during the nesting season, could result in “take” of active nests, which would be a violation of the MBTA and/or Fish and Game Code (Envicom 2026). The CFGC defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Under the MBTA, it is unlawful to kill, directly harm, or destroy individuals, eggs, or nests or otherwise cause failure of an ongoing nesting effort. Take of an active nest would be considered a significant impact. Construction activities associated with the Proposed

Project would have the potential to affect nesting birds. Therefore, this impact is potentially **significant**.

Impact BIO-2: Construction of the Proposed Project would potentially have an adverse effect on migratory birds.

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

If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 1 and August 31, the County or contractor shall retain a qualified biologist (i.e., experienced with conducting nesting bird surveys) who shall conduct a focused nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating construction activities within any potential nesting habitat (all vegetation, buildings, eaves on buildings, etc.). The size of the nesting bird survey area shall be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It may also include a buffer area if deemed necessary by the qualified biologist. The preconstruction nesting bird surveys shall be conducted no more than seven days prior to initiation of vegetation removal, building demolition activities, or noise-generating construction activities. If no active nests are detected during these surveys, no restrictions on Project activities are necessary.

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

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure BIO-2, which includes a focused nesting bird survey, active nest monitoring and buffering of nest areas, and reporting the results of the survey and approval of the buffer areas, would reduce the significant impacts to nesting birds to a less-than-significant level.

Operation

Under operational conditions, the Proposed Project would redevelop portions of the Project Site with uses that would support a mixed-use community located in an urbanized area within the City of Los Angeles and County of Los Angeles. The Proposed Project's uses are not anticipated to 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. The surrounding area is characterized by existing urban development, including roadways and built infrastructure, which limits habitat connectivity and wildlife movement opportunities. The Proposed Project would include maintained open space and landscaping, including California native drought-tolerant lawn, shrubbery, flowers, and trees throughout the Project Site, that would increase greenspace within the Project Site. Increases in greenspace would enhance the availability of foraging opportunities and provide small-scale refuge for common, urban-adapted species (e.g., birds and pollinators). Proposed Project lighting, noise, and human activity levels would be consistent with typical urban conditions and would not introduce new barriers beyond those that already exist on the Project Site and surrounding area. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction

As stated in Section 3.3.2,*Existing Conditions*, the Project Site includes 42 coast live oaks. Per County of Los Angeles Ordinance 22.174.030, the County protects any tree of the oak genus (*Quercus*) that meets the following criteria:

- It is 25 inches or more in circumference (eight inches in diameter) as measured 4.5 feet above mean natural grade; in the case of an oak with more than one trunk, the combined circumference of any two trunks is at least 38 inches (12 inches in diameter) as measured 4.5 feet above mean natural grade, on any lot within the unincorporated area of the County.
- It has been provided as a replacement tree, pursuant to LA County Code Section 22.174.070, Conditions of Approval, on any lot within the unincorporated area of the County unless an Oak Tree Permit is first obtained.

An arborist survey of the Project Site was conducted, by Envicom to identify, locate, and tag protected trees on the Project Site (see Appendix D).A total of 42 individual protected oak trees meeting the County size requirements were observed (see Figure 3.3-1) (Envicom 2026). As stated in Section 3.3.2, individual native trees do not provide a woodland habitat, and the individual native oak trees on the Project Site do not provide an oak woodland habitat.

Individual native oak trees have been planted on-site as part of the Project Site's associated landscaping and are interspersed with non-native ornamental vegetation. Oak trees measuring 8 inches or greater in diameter or multiple-trunk trees whose largest two trunks have a combined diameter of 12 inches or more, as measured at 4.5 feet above natural grade, are protected under the County's Oak Tree Ordinance. In total, there are 42 protected coast live oak trees on the Project Site (see Figure 3.3-1) (Envicom 2026).

Construction of the Proposed Project could result in encroachment into the root protection zones or removal of protected coast live oak trees. Operation of facilities under the Proposed Project, including routine maintenance and pruning of vegetation and trees, has the potential to impact oak trees that are protected under the County's Oak Tree Ordinance. Construction and maintenance activities that result in removal/relocation, encroachment, or significant pruning of protected oak trees would be a **significant** impact.

Impact BIO-3: During the construction phase, the Proposed Project could impact protected live oak trees on the Project Site.

> **Mitigation Measure BIO-3: Mitigation for Impacts to Protected Trees.** Prior to removal, relocation, or maintenance of protected oak trees, a qualified arborist shall inventory and evaluate the health of protected oak trees on the Project Site and evaluate the potential for impacts. If the arborist determines that the proposed activity would cut, destroy, remove, relocate, inflict damage, or encroach into a protection zone of a protected oak tree, the Project Applicant shall submit an application for approval to the Los Angeles County Department of Regional Planning and obtain approval prior to impacting a protected oak tree. The Project Applicant(s) shall be required to implement the conditions of the approval, including planting and care of replacement trees and protections for non-impacted oak trees. When planting replacement trees is required, replacement trees shall be in the ratio of two trees planted for each tree impacted. Replacement trees shall be indigenous oak species and shall be at least 15-gallon size and measure at least one inch in diameter one foot above the base. Replacement trees shall be properly cared for and maintained for two years and replaced if they die within that period.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure BIO-3 would ensure that potential significant impacts to protected oak trees as a result of construction activities would be mitigated by obtaining approval from the Los Angeles County

Department of Regional Planning on an application to cut, destroy, remove, relocate, inflict damage, or encroach into a protected zone of a protected oak tree and planting replacement trees to offset significant impacts consistent with the County's Oak Tree Ordinance.

Operation

Operation of facilities under the Proposed Project, including routine maintenance and pruning of landscaping including vegetation and trees, has the potential to impact oak trees that are protected under the County's Oak Tree Ordinance. Maintenance activities that result in removal/relocation, encroachment, or significant pruning of protected oak trees would be a **significant** impact.

Impact BIO-4: During the operational phase, the Proposed Project could impact protected live oak trees on the Project Site.

Mitigation: Implement Mitigation Measure BIO-3.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure BIO-3 would ensure that potential significant impacts to protected oak trees as a result of operational activities would be mitigated by obtaining an Oak Tree Permit from the County and planting replacement trees to offset significant impacts consistent with the County's Oak Tree Ordinance.

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

Construction

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal level for the Project Site or adjacent areas (CDFW 2025b). As mentioned previously, the LA County General Plan 2035 Conservation and Open Space and Land Use Elements include SEAs, which represent a wide variety of biological communities in the County. The SEAs are intended to preserve and protect regional biodiversity. The Project Site is not in one of the County's SEAs. The nearest SEA is the Puente Hills SEA approximately six miles southeast of the Project Site. Therefore, the Proposed Project would not conflict with any local or regional Habitat Conservation Plan or Natural Community Conservation Plan. Implementation of the Proposed Project would result in **no impact** to an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Because there are no adopted Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal level, operation of the Proposed Project would not result in a conflict with an adopted plan. **No impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

3.3.5 Cumulative Impact Analysis

The study area for cumulative biological resource impacts consists of the general Project Site and a one-mile radius encompassing the cumulative projects identified in Chapter 3, *Environmental Analysis*, of this Draft SEIR, including the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). The geographic extent is appropriate because potential cumulative biological impacts associated with the Proposed Project would be localized in nature and limited to habitat disturbance, nesting birds, and urban-adapted wildlife species. The Project Site and surrounding area are characterized by highly urbanized land uses, and no regionally significant habitat linkages or sensitive natural communities extend beyond the immediate urban context. Accordingly, a one-mile radius provides a biologically meaningful area within which reasonably foreseeable project could contribute to cumulative habitat disturbance or species impacts.

The 2014 Master Plan EIR identified cumulative development within surrounding neighborhoods; however, for purposes of this Draft SEIR, a one-mile radius has been identified as the appropriate cumulative study area based on the localized nature of potential biological impacts and the urbanized setting of the Project Site.

Would the project have a cumulative effect related to biological resources?

SPECIAL-STATUS SPECIES

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to special-status species during construction. Special-status species are generally considered in a regional context, as regions often contain suitable habitats that support these species. However, the

Project Site and cumulative projects are in a highly urbanized and developed area of the County of Los Angeles, where suitable habitat for most special-status species is limited. As a result, redevelopment at the Project Site would have some potential to contribute to cumulative impacts. Impacts are potentially **significant**.

Impact BIO-5: During the construction phase, the Proposed Project could impact roosting special-status bats, including the pallid bat, western yellow bat, and western mastiff bat.

Mitigation: Implement Mitigation Measure BIO-1.

Significance with Mitigation: Less than significant. To reduce potential impacts to special-status species to a less-than-significant level, Mitigation Measure BIO-1 would be implemented. Implementation of Mitigation Measure BIO-1 would include preconstruction surveys, emergence surveys for species identification, and protective measures if bats are found on-site. In addition to Mitigation Measure BIO-1, the Project Site is not in any suitable habitat for special-status species because it is in a highly urbanized and developed area of the County of Los Angeles. Additionally, each cumulative project, including the Proposed Project, would be required to comply with applicable federal and state regulations, such as the MBTA and CDFW Code Sections 3503, 3503.5, and 3513, which protect nesting birds. Accordingly, while cumulative impacts to special-status species may be significant to the region, the Proposed Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts related to special-status species would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to special-status species during operation. Special-status species are generally considered in a regional context, as regions often contain suitable habitats that support these species. As previously discussed, there are no special-status plant species listed as rare, threatened, or endangered or with a CRPR Rank of 1 to 3 on the Project Site. While there is some limited potential for special-status wildlife species to occur on the Project Site, operation of the Proposed Project is not anticipated to impact nesting of these species beyond the impacts addressed under impact discussion (a). Outside of nesting activities, each of these species are highly mobile and are not likely to be directly harmed during operational activities. Therefore, redevelopment at the Project Site would have little potential to contribute to cumulative impacts on these species in a regional scope during operation. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

RIPARIAN HABITATS AND SENSITIVE NATURAL COMMUNITIES

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to riparian habitats and sensitive natural communities during construction. Riparian habitats and sensitive natural communities are generally considered in a regional context. Riparian habitats occur along the banks of rivers, streams, lakes, and other bodies of water. Rivers, streams, and lakes are typically fed by water originating in mountains and foothills, following defined pathways that eventually flow into larger bodies of water such as the Pacific Ocean or major lakes. Lakes can also be formed by man-made structures, such as dams, which alter the flow of streams or rivers to concentrate and retain water. Additionally, sensitive natural communities are native plant communities that have a limited distribution throughout a state, country, or region. As such, cumulative impacts to riparian habitats are best considered in a regional context, as activities occurring upstream or downstream can contribute to cumulative effects. Additionally, cumulative impacts to sensitive natural communities are best considered in a regional context.

The Project Site and cumulative projects are in a highly urbanized and developed area of the County of Los Angeles, where development is limited to infill. As stated in impact discussion (b), no riparian habitat is in or immediately adjacent to the Project Site and the Proposed Project's contribution would not be cumulatively considerable. Additionally, no sensitive natural communities exist on the Project Site, and the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to riparian habitats and sensitive natural communities during operation. The Project Site and surrounding area does not have riparian habitat. Additionally, the no sensitive natural communities exist on the Project Site and the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

WETLANDS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to wetlands during construction. Wetlands are areas where water covers the soil or is present either at or near the surface of the soil all year or for varying periods of time during the year, including during the growing season. Wetlands are formed in a variety of ways including river floodplain erosion, run off from glaciers, flooding, and the altering of drainage patterns, rivers, and streams from wildlife and humans. As such, cumulative impacts to wetlands are best considered in a regional context because impacts at any given geographical point within a river floodplain, a riverbed, stream or runoff from a glacier can impact wetlands downstream.

The Project Site and the cumulative projects are in a highly urbanized and developed area of the County of Los Angeles, where development is limited to infill. As stated in impact discussion (c), there are no federally protected wetlands within or immediately adjacent to the Project Site. Projects implemented under the Proposed Project would be required to obtain and comply with a General Construction Permit. Additionally, there are no rivers, streams, glaciers, or river floodplains on the Project Site and the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased impacts to wetlands during operation. As previously discussed, there are no rivers, streams, glaciers, or river floodplains on the Project Site. Therefore, Proposed Project's operation would not impact any federally protected wetland within or immediately adjacent to the Project Site. Thus, the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

MIGRATORY SPECIES AND WILDLIFE CORRIDORS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to migratory species and wildlife corridors during construction. Species migration involves seasonal

movement between habitats, typically for feeding or mating, and may span regions, states, or even countries. Wildlife corridors are areas of open space of sufficient width to permit the movement of larger, mobile species to move from one major open space region to another. Regional habitat linkages are larger wildlife corridors or regions of connectivity that are important for movement of multiple species and maintenance of ecological processes at a regional scale. As such, cumulative impacts to species migration and wildlife corridors are best considered in a regional context.

The Project Site and cumulative projects are in a highly urbanized and developed area of the County of Los Angeles, where development is limited to infill. As stated in impact discussion (d), the Project Site is highly developed and presents a number of obstacles and barriers to wildlife movement and does not contain an important wildlife crossing. Also, it is not necessary for wildlife to pass through the site to access essential resources for water, foraging, breeding, or cover. Therefore, the Proposed Project's contribution to cumulative impacts would not be cumulatively considerable. As such, no cumulative impacts to wildlife corridors would occur.

Impact discussion (d) also addresses potential impacts on migratory species such as fish and birds. Potential impacts, including cumulative impacts, would not occur to migratory fish because of the lack of streams, drainages, or other jurisdictional features on the Project Site. However, birds would potentially nest on the Project Site during the nesting season, including within trees, shrubs, on or in buildings, on the ground concealed in herbaceous/low-lying vegetation, and other suitable nesting features. Therefore, the Proposed Project has the potential to contribute to a cumulative impact. Impacts would be potentially **significant**.

Impact BIO-6: During the construction phase, the Proposed Project could impact migratory birds.

Mitigation: Implement Mitigation Measure BIO-2.

Significance with Mitigation: Less than significant. Mitigation Measure BIO-2 would be implemented. Mitigation Measure BIO-2 would consist of conducting a focused nesting bird survey, active nest monitoring and buffering of nest areas, and reporting the results of the survey and approval of the buffer areas. Accordingly, while cumulative impacts to migratory species and wildlife corridors may be significant in the region, the Proposed Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts related to migratory birds and wildlife corridors would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to migratory species and wildlife corridors during operation. The Proposed Project's uses are not anticipated to 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. The Proposed Project would include open space and landscaping that would increase greenspace within the Project Site. Therefore, the Proposed Project contribution would not be cumulatively considerable. Therefore, cumulative impacts would be **less than significant**.

Significance with Mitigation: Less than significant. No mitigation is necessary.

TREE PRESERVATION ORDINANCE

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to tree preservation ordinances during construction. Tree preservation ordinances are determined by each jurisdiction. Depending on the jurisdiction, each City or County may enact a tree preservation ordinance that protects certain trees but does not include others. Trees that are protected under tree preservation ordinances cannot always be qualified as a special-status species. As mentioned in Impact 3.3.4(e), County of Los Angeles Ordinance 22.174.030 protects any tree of the oak genus (*Quercus*) that meets certain criteria. As such, cumulative impacts to tree preservation ordinances are best considered in a local context.

The cumulative projects within the cumulative study area would be subject to City of Los Angeles regulations protecting trees and biological resources, such as the Protected Tree Ordinance (City of Los Angeles Municipal Code Section 46.00 et seq.) and other applicable policies in the City's General Plan and community plans. As stated in impact discussion (e), 42 individual protected oak trees meeting the County's criteria under Ordinance 22.174.030 were observed on the Project Site. Therefore, the Proposed Project has the potential to contribute to a cumulative impact. Impacts would be potentially **significant**.

Impact BIO-7: During the construction phase, the Proposed Project could impact protected live oak trees on the Project Site.

Mitigation: Implement Mitigation Measure BIO-3.

Significance with Mitigation: Less than significant. To reduce potential impacts to protected trees, Mitigation Measure BIO-3 would be implemented. Mitigation Measure BIO-3 would consist of obtaining an Oak Tree Permit from the County and planting replacement trees to offset significant impacts consistent with the County's Tree Protection Ordinance. Accordingly, while cumulative impacts to the Tree Preservation Ordinance may be significant, the Proposed Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts related to the County's Tree Preservation Ordinance would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to tree preservation ordinances during operation. The cumulative projects within the cumulative study area would be subject to City of Los Angeles regulations protecting trees and biological resources, such as the Protected Tree Ordinance (City of Los Angeles Municipal Code Section 46.00 et seq.) and other applicable policies in the City's General Plan and community plans during operational maintenance activities. As stated in impact discussion (e), 42 individual protected oak trees meeting the County's criteria under Ordinance 22.174.030 were observed on the Project Site. Therefore, the Proposed Project has the potential to contribute to a cumulative impact. Impacts would be potentially **significant**.

Impact BIO-8: During the operational phase, the Proposed Project could impact protected live oak trees on the Project Site.

Mitigation: Implement Mitigation Measure BIO-3.

Significance with Mitigation: Less than significant. To reduce potential impacts to protected trees, Mitigation Measure BIO-3 would be implemented. Mitigation Measure BIO-3 would consist of obtaining approval from the Los Angeles County Department of Regional Planning on an application to cut, destroy, remove, relocate, inflict damage, or encroach into a protected zone of a protected oak tree and planting replacement trees to offset significant impacts consistent with the County's Tree Protection Ordinance. Accordingly, while cumulative impacts to the Tree Preservation Ordinance may be significant, the Proposed Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts related to the County's Tree Preservation Ordinance would be **less than significant**.

ADOPTED HCP, NCCP, OR LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to adopted HCP, NCCP, or a local, regional, or state habitat conservation plan during construction. Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal or local level provide for the regional protection of plants, animals, and their habitats while allowing compatible and appropriate economic activity. Each of these plans is intended for a certain region, habitat, and/or local jurisdiction. As such, cumulative impacts to Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal or local level are best considered in a regional context.

As stated in impact discussion (f), there are no adopted Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal or local level for the Project Site or adjacent areas, which includes the cumulative projects. Additionally, the Project Site is not in one of the County's SEAs; the nearest SEA is the Puente Hills SEA, which is about six miles southeast of the Project Site. Accordingly, the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to adopted HCP, NCCP, or a local, regional, or state habitat conservation plan during operation. As stated in impact discussion (f), there are no adopted Habitat Conservation Plans or Natural Community Conservation Plans or similar approved plans at the State or federal or local level for the Project Site or adjacent areas, which includes the cumulative projects. Additionally, the Project Site is not in one of the County's SEAs; the nearest SEA is the Puente Hills SEA, which is about six miles southeast of the Project Site. Accordingly, the Proposed Project's contribution would not be cumulatively considerable. Therefore, **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

3.3.6 Comparison to the 2014 Master Plan EIR Impact Analysis

The 2014 Master Plan EIR and this Draft SEIR resulted in similar impact conclusions. As described in Section 3.3.4, *Project Impact Analysis*, and 3.3.5, *Cumulative Impact Analysis*, the Proposed Project would result in potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation measures. These include impacts to special-status bats, including the pallid bat, western yellow bat, and western mastiff bat, migratory birds, and live oak trees. With the implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3, each of these impacts would be reduced to a less-than-significant level.

Overall, the 2014 Master Plan and the Proposed Project both assumed similar levels of ground disturbance, demolition, and tree removals across the entirety of the Project Site. As previously stated and shown in Table 3.3-1, *Summary of Biological Resources Impact Conclusions in the 2014 Master Plan EIR*, the 2014 Master Plan EIR reached similar conclusions, identifying potentially significant impacts in these same topic areas that were reduced to a less-than-significant level with mitigation. Consistent with the findings from the 2014 Master Plan EIR, this Draft SEIR concludes that no significant and unavoidable impacts related to biological resources would result from implementation of the Proposed Project. The mitigation measures for biological resources in the 2014 Master Plan EIR have been revised for clarity and to include

updated regulatory timing and language, such as the occurrence of the nesting bird non-breeding season. As such, these revisions do not alter the substance or intent of the measures. Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.4 CULTURAL RESOURCES

This chapter of the Draft SEIR discusses the cultural setting of the Project Site and cultural resources that have the potential to be present. This chapter also identifies potential impacts that could result from future development and implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. Preparation of this analysis was informed by:

- *Phase I Cultural Resources Assessment LA County General Hospital Master Plan*, Envicom Corporation, April 2026 (Appendix E.1)
- *Los Angeles County General Hospital Campus Master Plan Project Subsequent Environmental Impact Historical Resources Technical Report*, Architectural Resources Group (ARG), April 2026 (Appendix E.2)

During the Notice of Preparation (NOP) public review period, which was from September 26 to November 21, 2025, comments were received regarding cultural resources impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*.

3.4.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations.

FEDERAL

National Register of Historic Places

The National Register is the nation's master inventory of known historical resources. Created under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. As described in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, in order to be eligible for

the National Register, a resource must both (1) be significant and (2) retain sufficient integrity to convey its significance (NPS 1997).

Significance is assessed by evaluating a resource against established criteria for eligibility. A resource is considered significant if it satisfies any one of the following four National Register criteria[1] (NPS 1997):

A. Associated with events that have made a significant contribution to the broad patterns of our history:

B. Associated with the lives of significant persons in our past;

C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;

D. Has yielded, or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or integrity – to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Whether a resource retains sufficient integrity for listing is determined by evaluating it against the seven aspects of integrity defined by the NPS (NPS 1997):

1. **Location** (the place where the historic property was conducted or the place where the historic event occurred);
2. **Setting** (the physical environment of a historic property);
3. **Design** (the combination of elements that create the form, plan, space, structure, and style of a property);
4. **Materials** (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);
5. **Workmanship** (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
6. **Feeling** (a property's expression of the aesthetic or historic sense of a particular period of time); and
7. **Association** (the direct link between an important historic event/person and a historic property).

[1] Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a "yes or no" determination – that is, a resource either retains sufficient integrity or it does not.[2] Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. Exceptions are made if it can be demonstrated that a resource less than 50 years old is (1) of exceptional importance or (2) is an integral component of a historic district that is eligible for the National Register (NPS 1997).

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties ("the Standards") offer guidance for evaluating proposed projects that may affect historical resources. The purpose of the Standards is to support the long-term preservation of a property's historic significance by maintaining, preserving, and rehabilitating its historic materials and character-defining features. They apply to historic buildings of all construction types, materials, sizes, and uses, and cover both the exterior and interior. The Standards also address related landscape features, the building's site and setting, and any new construction that is attached, adjacent, or otherwise associated with the historic property (NPS 2017).

In practice, the Standards have helped agencies (local, state, and federal) carry out their historic preservation duties when reviewing projects that could impact historical resources.

The Standards are used as a tool to evaluate potential effects on historical resources. However, they are not themselves part of the CEQA process. CEQA requires an assessment of physical environmental impacts, and the only connection between the Standards and CEQA appears in State CEQA Guidelines Section 15064.5(b)(3):

> Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

[2] Derived from National Register Bulletin 15, Section VIII: "How to Evaluate the Integrity of a Property."

The Standards were developed by the National Park Service and are paired with Guidelines for four possible "treatments" of historical resources: (1) preservation, (2) rehabilitation, (3) restoration, and (4) reconstruction. For this Project, the applicable treatment is rehabilitation.

Rehabilitation Standards

The Secretary of the Interior's Standards for Rehabilitation (the "Rehabilitation Standards") cover the treatment that is most commonly applied to historic properties. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." This definition recognizes that repairs or modifications to a historic resource may be necessary to support modern use, but it also requires that the materials, features, and finishes that express the property's historic character be retained.

The Rehabilitation Standards further address additions to historic structures as well as new construction—or "infill"—located next to historic buildings, whether on the same property or within a historic district. As with most design and planning considerations, what is appropriate depends on the specific scale, context, and conditions of the project (NPS 2017).

Guidance for Related New Construction

The Rehabilitation Standards provide guidance for new construction that is related to (or, adjacent to) historic buildings or located within sensitive historic settings or historic districts. In general, new construction in historic settings (and districts) is allowed but must be compatible yet differentiated from the adjacent or related historic buildings so that it does not create a false sense of historical development. Compatibility is evaluated through scale and massing, proportion and height, materials and textures, architectural features, and site placement and setbacks.

The Secretary of the Interior's Guidelines provide the following recommendations for the construction of new buildings within a historic setting/district or adjacent to historic buildings (NPS 2017):

- Identifying, retaining, and preserving building and landscape features that are important in defining the overall historic character of the setting. Such features can include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.
- Retaining the historic relationship between buildings and landscape features in the setting. For example: preserving the relationship between a town common or urban plaza and the adjacent houses, municipal buildings, roads, and landscape and streetscape features.

- Adding a new building to a historic site or property only if the requirements for a new or continuing use cannot be accommodated within the existing structure or structures.
- Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.
- Designing new construction on a historic site or in a historic setting that it is compatible but differentiated from the historic building or buildings.
- Considering the design for related new construction in terms of its relationship to the historic building as well as the historic district and setting.
- Ensuring that new construction is secondary to the historic building and does not detract from its significance.
- Using site features or land formations, such as trees or sloping terrain, to help minimize the new construction and its impact on the historic building and property.

Finally, the Rehabilitation Standards suggest that adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

STATE

The Proposed Project is subject to the provisions of Assembly Bill (AB) 52. Refer to Chapter 3.16, *Tribal Cultural Resources*, of this Draft SEIR for a description of AB 52.

California Register of Historical Resources

The California Register is the authoritative guide to the State's significant historical and archaeological resources. In 1992, the California legislature established the California Register "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[3] The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed in or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historical resources surveys, are eligible for listing in the California Register (OHP 2025).

[3] California Public Resources Code, Section 5024.1 (a).

The structure of the California Register program is similar to that of the National Register, but places its emphasis on resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant at the local, state, or national level under one of the following four criteria, which are modeled after the National Register criteria listed above (OHP 2025):

8. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
9. It is associated with the lives of persons important to local, California, or national history;
10. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;

It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.[4]

Like the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.

There is no prescribed age limit for listing in the California Register, although California Register guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."[5]

Resources are automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register.[6]

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[4] California Public Resources Code SS5024.1, Title 14 CCR, Section 4852.

[5] California Office of Historic Preservation, Technical Assistance Series #6: California Register and National Register: A Comparison (Sacramento, CA: California Department of Parks and Recreation, 2001), 3. According to the Instructions for Recording Historical Resources (Office of Historic Preservation, March 1995), "Any physical evidence of human activities over 45 years old may be recorded for purposes of inclusion in the OHP's filing system. Documentation of resources less than 45 years old may also be filed if those resources have been formally evaluated, regardless of the outcome of the evaluation." This 45-year threshold is intended to guide the recordation of potential historical resources for local planning purposes, and is not directly related to an age threshold for eligibility against California Register criteria

[6] California Office of Historic Preservation, Technical Assistance Series #5: California Register of Historical Resources, The Listing Process (Sacramento, CA: California Department of Parks and Recreation, n.d.), 1.

California Penal Code Section 622.5

California Penal Code Section 622.5 identifies it as a misdemeanor to injure or destroy objects of historical or archaeological interest located on public or private lands, but specifically excludes the landowner (Justia 2024).

State Health and Safety Code Section 7050.5/California Public Resources Code Section 5097.98

Under State Health and Safety Code (HSC) Section 7050.5, if human remains are discovered during any project activity, the County coroner must be notified immediately. If human remains are exposed, HSC Section 7050.5 states that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. Construction shall halt in the area of the discovery of human remains, the area of the discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the County coroner to be Native American, the County coroner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased person so they can inspect the burial site and make recommendations for treatment or disposal (CLI 2010).

California Health and Safety Code Sections 88010 – 88011, The California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act establishes a State repatriation policy intent that is consistent with and facilitates implementation of the Federal Native American Graves Protection and Repatriation Act. The law ensures that all California Indian human remains and cultural items are treated with dignity and respect, encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California, and states an intent for the State to provide mechanisms for aiding California Indian tribes, including non-Federally recognized tribes, in filing repatriation claims and getting responses to those claims (CLI 2001).

State Guidelines for Cultural Resource Inventory, Evaluation, and Data Recovery

Guidelines from the State of California State Historic Preservation Office (SHPO) on cultural resources are clear as to the roles and responsibilities of landowners versus the lead agency toward cultural resource identification, evaluation, and treatment (OHP 2025b). Individual landowners, as per California Office of Historic Preservation Technical Assistance Series #1 CEQA and Historical Resources, are responsible for the identification (inventory) of cultural resources and their evaluation for proposed development Projects. The lead agency is responsible for determining whether the inventory and evaluation process was correctly followed and determines the correct and appropriate level of investigation for data recovery situations, which

normally is a negotiated process that involves the landowner, the lead agency, and possibly interested third parties, such as Native American tribal groups.

The State of California also provides lead agencies and consultants with "best practice" professional guidelines for conducting inventory, evaluation, and data recovery Projects, as well as how to support recommendations of cultural resource significance and how to write treatment and data recovery plans. Often, lead agencies appraise cultural resource technical documents and resource recommendations based on whether the consultant followed the professional methodology as outlined in the SHPO guidelines.

LOCAL

County of Los Angeles Historic Preservation Ordinance

The County of Los Angeles Board of Supervisors adopted a Historic Preservation Ordinance (HPO) on September 1, 2015. The HPO enumerates policies and procedures for designating properties in unincorporated areas of the County to a local register, called the County of Los Angeles Register of Landmarks and Historic Districts.

Eligibility criteria for local designation in the County of Los Angeles Register of Landmarks and Historic Districts are enumerated in Chapter 22.124.070 (Criteria for Designation of Landmarks and Historic Districts) of the Los Angeles County Code of Ordinances (County of Los Angeles 2025a). The following Subsections outline the criteria:

A. A structure, site, object, tree, landscape, or natural feature may be designated as a landmark if it is 50 years of age or older and satisfies one or more of the following criteria:
    1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;
    2. It is associated with the live of persons who are significant in the history of the nation, State, County, or community which it is located;
    3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;
    4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;
    5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;

6. If it is a tree, it is one of the largest or oldest trees of the species located in the County;
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

B. Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria set forth in Subsection A, above, and exhibits exceptional importance.

C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may be designated as a landmark or included in the landmark designation of a property if the space qualifies for designation as a landmark under Subsection A or B, above.

D. Historic Districts. A geographic area, including a non-contiguous grouping of related properties, may be designated as a historic district if all of the following requirements are met:
   1. More than 50 percent of owners in the proposed district consent to the designation;
   2. The proposed district satisfies one or more of the criteria set forth in Subsections A.1 through A.5, above; and
   3. The proposed district exhibits either a concentration of historic, scenic, or sites containing common character-defining features, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality; or significant geographic patterns, associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of parks or community planning.

County of Los Angeles General Plan

The Conservation and Natural Resources Element of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) was updated in 2025 (County of Los Angeles 2025b). The Conservation and Natural Resources Element guides the long-term conservation of not only natural resources but also cultural resources. Applicable policies from the Conservation and Natural Resources Element include:

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- **Policy C/NR: 14.2.** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- **Policy C/NR 14.3.** Support the preservation and rehabilitation of historic buildings.
- **Policy C/NR 14.5.** Promote public awareness of historic, cultural, and paleontological resources.
- **Policy C/NR 14.6.** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

3.4.2 Existing Conditions

CULTURAL SETTING

The cultural setting provides the historical, ethnographic, archaeological, and cultural resource context for the Project Site. Prehistoric context comes from past archaeological and ethnographic research. Historical cultural context comes from multiple written documents, including both primary (original) documents and secondary documents (i.e. books, manuscripts, and articles). Photographs and artwork can also provide cultural setting information; both can be original images of subjects or landscapes within their original context, or representational images that have been recreated later in time, such as demonstrative reconstructions of indigenous lifestyles that were commonly produced by anthropologists and museums in the 20th Century. Detailed ethnographic and cultural setting for the region can be found in Appendix E.1 (Envicom 2026).

Paleo-Indian Period (11,000-9,000 B.C.)

Paleo-Indian Period sites are the least common archaeological sites related to Native American occupation in California. Low numbers of Paleo-Indian sites come from smaller prehistoric population numbers during this period, highly mobile populations that did not produce stable settlement sites, and drastic changes in the California shoreline from a rise in ocean levels, which has resulted in most coastal paleo sites being today under water. Native Americans during this time would have been highly mobile, with limited trade between groups. Small, family-centered groups may have come together as bands during certain annual meetings, linked with seasonality, however, such sedentary living was an exception in their wide-ranging yearly movement cycle.

Archaic Period (9,000-7,000 B.C.)

The Archaic Period for Southern California has been re-interpreted and refined often over the last fifty years. The original Archaic Period has recently been refined and is now believed to include several distinct periods. This evaluation uses the more recent interpretation of the Archaic Period, as the two thousand years after the transition away from a predominant hunting lifestyle to a less mobile hunting and gathering lifestyle by Coastal Native Americans.

Changes during the Archaic Period are a response to changes in the climate and environment at the end of the Paleo-Indian period. The hunting and gathering lifestyle of Archaic Period people is characterized by a wide array of bifaces, choppers, scrapers, and other tools associated with a high-mobility strategy to exploit a wider range or regional resources. This period is poorly represented in the Project Site and surrounding area with few sites identified within this period located in the region.

Milling Stone Period (7,000-5,000 B.C.)

The prehistoric chronology after 7000 B.C. has been divided into several distinct periods, as outlined by Glassow et al. (2007). For the purpose of this study, Glassow et al. represents the most recent, widely referenced chronology. The Milling Stone Period is characterized by small, mobile Native American groups with a general shift in diet to the primary collecting of plant materials, accompanied by a dependence on groundstone implements associated with the grinding of seeds (Glassow et al. 2007).

Archaeological sites of this time are characterized by abundant groundstone tools, especially manos (handstones, mullers) and metates (milling stones, slabs). Cultural sites often have thick midden deposits (soil build up over time from the activities of a habitation), cooking features, and long-term habitation of re-used locations within the yearly settlement cycle. Flaked tools are made of cherts, quartzite, basalt, and other lithic materials. Most archaeological sites from this period have been identified on the coast, but near-coastal inland sites have also been recorded. Middens (refuse dumps) contain shellfish, some fish bones, and fragmented larger mammal bones, such as deer. Olivella shell beads appear at this time, indicating the beginnings of regional trade.

Middle Period (5,000-2,000 B.C.)

Cultural sites identified as being within the Middle Period are characterized by changes in the size and shape of metates and manos, and the introduction of mortars and pestles, which allowed for greater population sedentism, and higher levels of social organization. The number and types of Projectile points increased during this time. Specialized sites during the Middle Period included temporary camps, single primary-focus activity areas, such as quarries, and long-term settlement locations. Regional trade, primarily between the mainland and the Channel Islands, took place with large numbers of diverse ornaments and shell beads found in mortuary settings dating to the period.

Transition Period (2,000 B.C.-A.D. 1)

The Transition Period indicated an intensification of prehistoric fishing and sea mammal hunting, with a reduction in shellfish utilization and an increase in regional trade networks. At this time, sedentism and long-term occupation of sites increased, accompanied by more elaborate social practices and formal cemeteries. Ritual burial objects become common and mortuary practices suggest an increase in social wealth and status.

Later Period (A.D. 1-A.D. 1,000)

Coastal sites appear to have had relatively dense populations by the end of the Middle Period, as well as an exchange relationship between the occupied coastal islands, the mainland coast, and interior regions that expanded during the Late Period. Certain trends continued during the Late Period, including substantial midden deposits, defined cemetery use, and the first evidence

of true bow and arrow use. Overall, the variety and complexity of material culture increased during this period, demonstrated by a more diverse classes of artifacts.

The prehistoric Late Period also saw the production of many beautiful and complex objects utility, art, and decoration. These artifacts include steatite cooking vessels and containers, steatite arrow shaft straighteners, perforated stones, a variety of bone tools, and personal ornaments made from bone, stone, and shell, including drilled whole *Chinone* (Venus clam) and drilled abalone. During this period an increase in population size was accompanied by the establishment of larger, more permanent villages with greater numbers of inhabitants. The presence of permanent villages were identified during this time, noting evidence from archaeological site of *Talepop* (*Ta'lopop*) site near Calabasas, north of the Project Site. Most of the evidence to this point in the regional chronology has come from archaeological sites. Urbanization has destroyed many prehistoric sites in Southern California and impacted many others.

The Ethnographic Period (A.D. 1,000-A.D. 1,542)

The period after A.D. 1000 until first contact with Europeans marks the Ethnographic Period of Native American history in Southern California, when the material culture and social organizations later observed and recorded by the Spanish explorers and other Western observers were fully developed, but not yet completely influenced by European contact. Archaeological researchers suggest that the ethnographic period was a time of cultural change for Southern California Native Americans due to notable changes in water temperature, climate change, and drought cycles as prominent factors influencing social and material cultural changes from the Late Prehistoric

By the time of first contact with Europeans in the 1500s, the northern Los Angeles region was occupied by a number of different tribal groups, each with different material cultures as described by archaeologists and the ethnographic record. The northern Los Angeles Basin area, including the Project Site, was mostly controlled by the Gabrielino/Tongva people. To the west, were the Chumash with a major Chumash village located at Malibu. The San Fernando Valley was mostly controlled by the Gabrielino/Tongva tribal group, who centered on the Los Angeles Basin area to the south. The Gabrielino/Tongva people shared a rough border with the Chumash tribal group to the west around the Topanga Canyon area, and with the Tataviam tribal group to the north along the northern edge of the San Fernando Valley. Among all these groups, organization was further divided by band, region, and even by extended family lineages, with differences in culture and technology being identified by archaeologists, ethnographers, and historians.

Notably, a Gabrielino/Tongva village, called *Yaanga*, was located near the Project Site. An excerpt from the 2014 Master Plan EIR describing *Yaanga's* location and significance is provided below:

> "One major ethnographic Gabrielino village close to the project site was the village of Yaanga, one of the largest Gabrielino villages in the region. The precise location of Yaanga is uncertain because the original community was abandoned sometime prior to 1836. Yaanga was most likely located slightly south of the old Spanish plaza of El Pueblo de Los Angeles, near where the former Bella Union Hotel was later built on Main Street above Commercial Street. The reference to this well-known 19th-century Los Angeles hotel places this village location about two city blocks northwest of the project site. The village of Yaanga was later instrumental in the founding of El Pueblo de Los Angeles because the Spanish colonial governor wanted a Native American village population to support the new civil community with labor and materials."

Though the Project Site is located near the modern Los Angeles River, the original embanked river pathway would have been larger than the current cemented flow route. Within these wide embankments, the original Los Angeles River followed a braided pathway, with highly variable side channels, sand and gravel bars, and new main river sections forming randomly each year. It was also common for the immediate floodplains surrounding the original river embankments to flood periodically, creating a large, wide lake where the turbulent river once flowed.

Within this unpredictable river context, the Los Angeles River and its embankment areas were rarely used by the indigenous people of Southern California for permanent habitation locations. Historically, they favored smaller, more predictable water sources, especially from springs or better watered smaller streams that would not be a danger during flash flood events. For example, the ethnographic Gabrielino settlement Yaanga (a Tribal Cultural Resource) was located on higher grounds away from the Los Angeles River, but close enough to the river to exploit its wetland resources when water flowed through the river channel. The distance from the river provided safety from possible flooding events that were a common risk during California's rainy season.

Similarly, any ephemeral seasonal water paths that were once located on the Project Site were most likely not the location of permanent indigenous habitation. Since such dry streams were most likely seasonal, they held water only briefly during wet years and did not create a predictable source of water or resources. The indigenous people of California before first contact with Europeans, understood the highly variable environment that they lived within, and often placed their settlements where they could maximize protection from flood events, but also near to the few stable water sources found on the local landscape.

First Contact Through the End of the Spanish Mission Period (A.D. 1542-A.D. 1822)

The earliest Spanish explorers of the California coast included Juan Rodriguez Cabrillo in 1542, Pedro de Unamuno in 1587, Sebastian Rodriguez Cermeño in 1595, Sebastián Vizcaíno in 1602,

and Gaspar de Portolá in 1769. These early expeditions were transient in nature, and rarely impacted the areas traveled through except as a novelty. By the 1770s, enough Spanish settlers were entering into the Southern California region that a late Ethnographic Period account of indigenous people and lifestyles could be formed. In using these historical accounts, it is also true that the European observations from that time wrote with extensive biases in their writing. Almost all of the early Spanish and European visitors to Southern California believed in the inferiority of other cultures and people.

Gaspar de Portolá visited the Los Angeles Basin and San Fernando Valley in 1769 on his way to the Santa Clara Valley in Northern California. De Portolá's northern trip followed a well-known route along the Los Angeles River through Castaic, then down the Santa Paula River Valley to the Ventura area, before turning northward again. The San Gabriel mission was still under construction, being founded a year later in 1771.

Many of the Native Americans then living in Southern California were later "Missionized," i.e. forcibly settled to local mission lands to serve as support labor. In the Los Angeles Basin area, indigenous people were moved to the San Gabriel Mission. In the San Fernando and Conejo Valleys, Chumash indigenous people were forced to move to either the San Buenaventura Mission or to the San Fernando Mission. The Gabrielino/Tongva and Tataviam people located within the Valley were moved to the San Fernando Mission.

Missionization also destroyed the traditional social subsistence system, disrupted regional trade networks, and transformed the Native American material culture into a mixture of surviving ethnographic artifacts and European goods. Disease, the loss of a lifestyle that had been adapted to the California environment for generations, and the predation of the Spanish all led to a rapid decline in Native American population numbers.

The Mexican Statehood Period Through the U.S. Period (A.D. 1822-Present)

When Mexico won independence from Spain in 1822 the political system in California changed dramatically. Mexican land grants were awarded to soldiers, friends, and relatives of Spanish governors who ruled California between 1823 and 1846. During that time, the land holdings and influence of the religious missions were greatly diminished.

At the same time, the United States government began a decades-long process of determining the fate of the original Mexican land grants in California, several of which were located within in the Project area. This process left the ownership of many parcels and ranches in question for long periods of time. Many of the land grants changed hands several times, especially after Mexican independence, until land ownership legal issues were finally settled in the 1860s and 1870s. After this time, the original Spanish-heritage families began selling off smaller parcels to American investors, which expanded the ranching of cattle and sheep in the area.

HISTORIC SETTING

Provided below is a discussion from Appendix E.1 and Appendix E.2 regarding the historic setting for the Project Site (ARG 2026, Envicom 2026).

Los Angeles General Hospital History

The origins of the Project Site date back to 1858, when the hospital was first established in an adobe home. In 1878, the County of Los Angeles Board of Supervisors purchased 37.72 acres of land on Mission Road in Boyle Heights to construct a County hospital. A two-story hospital ward, which initially had approximately 100 beds, was constructed on Mission Road (on the west half of the Project Site; it has since been demolished). This building served the Los Angeles County Hospital until the Acute Unit opened in the 1930s (ARG 2026 [Appendix E.2]). Throughout the late 19th century and early 20th century, the County Hospital expanded into a cluster of multiple buildings along Mission Road between Zonal Avenue (then South Griffin Avenue) and Marengo Road. The Administration Building, which is the oldest hospital building still standing, was constructed in 1909. The Mission Road gatehouse, which first appears on a 1915 map, is the second oldest structure still on the Project Site. The Service Building (now known as the Pharmacy Building), constructed in 1917, is the third oldest structure still on the property. During this period, the Project Site also contained a library building, a building for psychiatric patients, a power plant, and recreational areas, in addition to medical wards and residential buildings; none of these buildings or features, with the exception of those mentioned above, are extant today (Envicom 2026 [Appendix E.1]).

Los Angeles County Hospital integrated a teaching component from its early years. The University of Southern California (USC) founded its College of Medicine in 1885, and medical students were taught at the County Hospital from the outset. A nursing school was also founded in 1895 by the hospital under the direction of the Medical College. In 1921, the College of Osteopathic Physicians and Surgeons purchased land at the corner of Griffin Avenue and Mission Road, across the street from County Hospital. Similar to the County Hospital's relationship with USC College of Medicine, the osteopathic college established a training program with the osteopathic ward, located on the County Hospital Campus (ARG 2026 [Appendix E.2]).

The hospital expanded rapidly between the 1910s and early 1930s due to a boom in the County's population and advancements in medical knowledge. This expansion included the Communicable Diseases Building, the Tuberculosis Ward, the Laundry Building, support buildings, and additional employee housing. All of these structures have since been demolished (Envicom 2026 [Appendix E.1]).

In the early 1920s, the County Hospital hired a team of consultants to advise on its continued expansion. The consultants initially recommended six new ward buildings with a total of 1,500 new beds on the new site east of North State Street. In the end, the architecture team decided

on one large hospital building that emphasized verticality rather than multiple buildings spread out over the County Hospital Campus. The approximately 1.2 million square-foot, 19-story Art Deco building was designed by the Allied Architects Associated, and was constructed between 1927 and 1933, during the Great Depression. The hospital's new Acute Unit, funded by the 1923 bond measure, opened in 1933. Its design was influenced by the common incidence of infectious disease among patients; the vertically stacked wards separated by stairwells and elevators were intended to reduce traffic of patients, visitors, and staff and therefore the spread of disease. With the opening of the new Acute Unit, the number of beds at the hospital increased to 1,494. The hospital was located on approximately 35 acres by this time (ARG 2026 [Appendix E.2]).

As a part of this construction, North State Street was reconfigured, and the landscape was extensively terraced (Envicom 2026 [Appendix E.1]). Buildings on the Project Site reflect a range of architectural styles popular from the early 20th century to the post–World War II period, including Italian Renaissance Revival, Mission Revival, Spanish Colonial Revival, Mediterranean Revival, Art Deco, Mid-Century Modern, and Late Modern.

In the following years, as the City's population grew and the local community's medical needs changed, the County Hospital expanded into a medical complex, annexing property south and east of the General Hospital Acute Unit, and was renamed the Los Angeles County University of Southern California Medical Center. As a part of this expansion, several of the older hospital buildings were demolished to make room for new buildings. By the 1960s, the complex included the Acute Unit, the Pediatric Pavilion, the Psychiatric Hospital, and the Women's and Children's Hospital. The Campus was referred to as the LAC+USC General Medical Center during this time. Later, with the expansion of private insurance and the development of other regional hospitals, the County Hospital's primary role became serving low-income communities (Envicom 2026 [Appendix E.1]). Expansion of the Project Site continued into the early 1970s with the construction of new adjoining buildings for the Chief Medical Examiner and County Coroner in 1972 and the purchase of the old California College of Medicine Campus (originally the College of Osteopathic Physicians and Surgeons) in 1974, following the College's 1960s departure to Irvine (ARG 2026 [Appendix E.2]). The Los Angeles General Hospital Campus continued to serve as the County Hospital into the 21st century, despite aging facilities and equipment (Envicom 2026).

The 1994 Northridge earthquake caused extensive damage to many of the buildings on the Los Angeles General Hospital Campus. As a result, buildings in the area to the west of the 1933 Acute Unit, which contained some of the hospital's oldest buildings, including several early 20th century support services structures, were demolished in the mid-1990s and early 2000s. Several post–World War II Campus buildings were demolished during this time as well. The Acute Unit also endured significant damage from the Northridge earthquake. As a result, the Federal Emergency Management Agency (FEMA) provided financial assistance to the County for replacement of damaged hospital facilities and subsequent reuse and protective storage of the

historic hospital building. The new replacement hospital complex—composed of the Inpatient Tower, Clinic Tower, Diagnostic & Treatment Building, and East Central Power Plant—was completed in 2008. Development of the Campus has continued into the early 2020s with the construction of phase one of the Restorative Care Village (RCV) (2022) and the Childcare Center (2023). Phase two of the RCV is currently under construction (ARG 2026). As discussed in Chapter 1, *Introduction*, of this Draft SEIR, the County of Los Angeles Board of Supervisors approved the name change of the Campus to Los Angeles General Medical Center on May 2, 2023. The reference to the former name of the Campus is used in this chapter to identify previous evaluations.

Activism for Better Health Practices in Underrepresented Communities

As a public building intended to serve the Los Angeles region, Los Angeles General Hospital has been at the forefront of various movements to advocate for better health practices when treating underrepresented groups, in particular, the Chicana and Lesbian, Gay, Bisexual, Transgender, and Queer/Questioning Plus (LGBTQ+) communities.

Mexican-American Community

Los Angeles General Hospital is associated with landmark civil rights legislation related to the forced sterilization of women in the 1960s and 1970s. Between 1968 and 1974, more than 200 women, primarily from the Mexican American community, were sterilized at General Hospital. The women were often pressured to sign County consent forms for sterilization while under duress or without understanding the extent of the procedure. Language barriers exacerbated the confusion as the forms were generally presented in English only. In response to these forced sterilization practices, Dr. Bernard Rosenfeld, a physician and researcher at the hospital, requested the legal services of Model Cities Center for Law and Justice to look into the case. The Model Cities Center subsequently collaborated with the Chicana rights organization Comisión Feminil Mexicana Nacional to reach out to affected women in the community and ultimately filed a lawsuit against the County. The court case was filed in 1975 and would come to be known as *Madrigal v. Quilligan*. On June 7, 1978, Judge Jesse W. Curtis ruled that there was no deliberate intent by the hospital staff to hurt the women and that "sterilizations were the result of miscommunication and language barriers between the patients and the doctors" (Library of Congress 2025). Nevertheless, the landmark civil rights case led to several changes in how the hospital system in California operated and ultimately resulted in the State of California revoking its sterilization law (Chattel 2025).

LGBTQ+ Community

During the late 1980s and early 1990s, Los Angeles General Hospital was once again the focus of activism as members of the LGBTQ+ community conducted actions outside of the Acute Unit to advocate for better support for those who had been affected with Acquired Immunodeficiency

Syndrome (AIDS). The AIDS epidemic had already been spreading throughout the United States and advocacy groups such as ACT UP were being established to help find solutions. ACT UP was first established in New York on March 12, 1987, though the Los Angeles chapter (also known as ACT UP/Los Angeles or ACT UP/LA) was formed later that year on December 4, 1987 and included 400 people at its first meeting.

Leaders within the AIDS advocacy community lamented that the County's health system had "yet to comprehensively address the AIDS epidemic in a medically sound, fiscally responsible and compassionate manner...with one-third of all people with AIDS and AIDS-related illnesses relying on this system" (Cashman et al. 1989). Protests through 1988 "were organized to bring pressure on the Board of Supervisors and the county Department of Health Services," leading to a commitment from the County to open a 20-bed AIDS research ward sometime in 1990. Activists argued that this was not enough to address "a current average daily census of 60 hospitalized patients with AIDS and AIDS-related illnesses" (Cashman et al. 1989).

In January 1989, ACT UP/LA, along with other groups such as AIDS Project LA and Being Alive, organized a weeklong vigil outside of the hospital with a goal "to see comprehensive AIDS and HIV positive treatment programs established, a 50 percent increase in staff and facilities at the outpatient clinic, and a 50-bed AIDS ward opened within six months, with 50 more beds added within one year" (LA Weekly 1989). A reported 20 to 60 people gathered for the vigil but "despite nightly local TV coverage and frequent reports in the [Los Angeles] Times, the vigil did little to affect the immediate action ACT UP was demanding" and "DHS offered their standard line: 20 beds by 1990" (Sadownick 1991). The 20-bed AIDS unit was opened, though wait times for treatment had now grown to five months. Community-based organizations like AIDS Healthcare Foundation (AHF) were now becoming healthcare providers, with AHF at the time "treating 600 patients, most of whom were on the county waiting list" (Sadownick 1991).

Overall, the perceived lack of action by the County at Los Angeles General Hospital in response to the protests and vigils on the Campus contributed to the transformation of the AIDS advocacy landscape in Los Angeles where community-based organizations moved to treat patients themselves. Rather than focusing solely on protests and vigils, which were growing to be seen as ineffective, advocates found themselves entering decision-making spaces to fight for change.

Osteopathic Medicine at General Hospital

Provided below is a summary from the Historic Resources Report regarding the Campus' history related to osteopathic medicine (ARG 2026 [Appendix E.2]).

Osteopathy was introduced in America in the 1870s as a comprehensive therapeutic approach for promoting health and fighting disease. Two osteopathic colleges were established in Southern California in the late 19th and early 20th centuries: the Pacific Sanitarium and School

of Osteopathy, which was established in Whittier in 1896 and moved to a three-story building (now known as North Hall) at the corner of Mission Road and Daly Street in 1904; and the Los Angeles College of Osteopathy, which opened in 1905 in downtown Los Angeles. The two schools merged in 1914 and became the College of Osteopathic Physicians and Surgeons, which operated on its campus adjacent to the Los Angeles General Hospital main campus from 1921 to 1968.

In 1921, the College purchased property at Mission Road and Griffin Avenue. Around this time, its three-story building at Mission and Daly Street (now North Hall) was moved to the new site for use as a clinic; however, classes remained concentrated in downtown Los Angeles until the late 1920s/early 1930s. The college underwent a building program in the late 1920s, during which a laboratory building (now the Library) and an administration and auditorium building (now Tower Hall) were built on the new site. After a new contagious disease building was completed on the Los Angeles General Hospital campus in 1924, the existing contagious disease building (1904, demolished) was remodeled for use as an osteopathic ward. The new osteopathic ward served as a teaching hospital for students while also providing medical care—a parallel relationship seen between Los Angeles General Hospital and USC's medical school. Despite the inclusion of an osteopathic building on the Los Angeles General Hospital main campus, "elaborate measures had been made for separation of the two units of the hospital and for the admission of patients to each unit" (Martin 1979). Regardless of this careful separation, the American College of Surgeons removed Los Angeles General Hospital from its list of accredited hospitals due to the presence of the osteopathic hospital on campus. In 1934, the County Board of Supervisors voted to end this practice. Following this order, General Hospital's accreditation was renewed by the American College of Surgeons.

While the Los Angeles County Osteopathic Hospital operated on the General Hospital main campus, the College expanded its adjacent campus in the 1930s and 1940s with the purchase of additional land on Griffin Avenue, north of its original site and extending to Alhambra Avenue. North Hall was moved to its present location at the corner of Griffin Avenue and Alhambra Avenue in 1937. This period also included the completion of a new laboratory, assembly and classroom building (now Phinney Hall), and a science classroom building (now the Science Building).

Attitudes towards osteopathic medicine began to shift in the post–World War II period towards incorporating osteopathy into the greater medical profession; the shift was also seen at General Hospital. In 1959, a new osteopathic hospital was completed on the Los Angeles General Hospital Campus (later the Women's and Children's Hospital, which has since been demolished). In 1961, the College of Osteopathic Physicians and Surgeons became the California College of Medicine under the umbrella of the University of California. The following year, the College received its accreditation from the Council on Medical Education and Hospitals of the American Medical Association. Additionally, osteopathic physicians were granted visiting privileges at Los Angeles General Hospital for the first time. The California College of Medicine moved to the

University of California, Irvine in 1968. In 1974, Los Angeles General Hospital purchased the former California College of Medicine campus, which now serves in part as the Los Angeles County College of Nursing and Allied Health.

Previous Historical Resource Evaluations

The Project Site has been the subject of multiple previous evaluations. The primary evaluations related to the Project Site occurred in 1994, 1999, and 2014 and are described in more detail below. In 1976, the Old Administration Building (Building 508) and the Los Angeles General Hospital–Acute Unit Building (Building 101) were both identified as individually eligible for designation in the National Register through a survey conducted by Dennis Smith and Tom Sitton of the Natural History Museum. The Old Administration Building was found eligible for reflecting early patterns of medical-related development during a period of rapid growth in the city. The Acute Unit Building was found eligible for its association with the increased demand for new and expanded medical facilities to accommodate Los Angeles' population influx in the 1920s (ARG 2026).

Additionally, in 2008, through the Adelante-Eastside Survey (completed by PCR Services Corporation (PCR) for the City of Los Angeles Community Redevelopment Agency), PCR identified the potential Los Angeles County-USC Medical Center District as eligible for federal, State, and local listing for its association with the increased demand for medical care and medical institutions coinciding with Los Angeles' population booms in the early to mid-20th century. The historic district boundaries encompassed the Project Site and extended to include the USC Keck School of Medicine to the north of the site, across Zonal Avenue (ARG 2026 [Appendix E.2]).

LAC+USC Medical Center, Los Angeles, FEMA 1008-DN-CA

In 1994, Historic Resources Group (HRG), on behalf of the State Historic Preservation Officer (SHPO), conducted a preliminary, focused survey of buildings on the Campus that had been damaged during the 1994 Northridge earthquake to determine potential historical significance as part of the Section 106 process, which had been initiated due to FEMA actions. HRG identified the buildings in Table 3.4-1, *Previously Identified Resources – 1994*, on the Campus as eligible as contributors to a National Register–eligible historic district. The buildings are listed in the Built Environment Resource Directory (BERD) with the California Historical Resource Status Code 2D2 (Contributor to a multi-component resource determined eligible for National Register by consensus through Section 106 process. Listed in the California Register). HRG also found the Los Angeles General Hospital–Acute Unit Building to be eligible for individual listing in the National Register and assigned the building Status Code 2B (Determined eligible for National Register both individually and as a contributor to a National Register-eligible multicomponent resource like a district in a federal regulatory process; listed in the California Register) (ARG 2026 [Appendix E.2]).

Table 3.4-1 Previously Identified Resources – 1994

Building Number	Building Name	Status (Extant/Demolished)	Status Code
101	Los Angeles General Hospital–Acute Unit	Extant	2B
102	Quality Assurance (Patient's) Building	Extant	2D2
103	Payroll (Visitor's) Building	Extant	2D2
N/A	Streetlights	Extant	2D2
508	Old Administration Building	Extant	2D2
701	Tower Hall	Extant	2D2
702	PFS Files – Building 110 (aka Library Building)	Extant	2D2
704	Science Building	Extant	2D2
705/706	Pediatric Outpatient Building	Extant	2D2

Source: ARG 2026(Appendix E.2)

In addition to the buildings listed in Table 3.4-1, HRG identified a "Support Services Site," (see Table 3.4-2, *Previously Identified Resources: Support Services Site – 1994*) which was assigned Status Code 2D2.[7] The Support Services Site comprised the original hospital campus to the west of State Street (the west half of the main campus) (ARG 2026 [Appendix E.2]).

[7] Individual status codes do not appear to have been assigned to buildings within the Support Services Site and are not included in BERD.

Table 3.4-2 Previously Identified Resources: Support Services Site – 1994

Building Number	Building Name	Status (Extant/Demolished)
502	Pharmacy Building	Extant
604	Tunnel (Viaduct)	Extant
N/A	Building 55	Demolished
N/A	Carpenter Shop	Demolished
N/A	Electric Shop	Demolished
N/A	Equipment Repair and Glass Shop	Demolished
N/A	Laundry Annex	Demolished
N/A	Main Laundry	Demolished
N/A	Old Powerhouse	Demolished
N/A	Research I	Demolished
N/A	Research II	Demolished
N/A	Sheet Metal Shop	Demolished
N/A	Smokestacks	Demolished
N/A	Women's Hospital	Demolished

Source: ARG 2026 (Appendix E.2)

HRG's letter to FEMA (dated March 7, 1994) notes that a comprehensive survey of the Los Angeles General Hospital site was not performed at the time of their site visit. Furthermore, the boundaries of the identified National Register-eligible district(s) were not delineated (ARG 2026 [Appendix E.2]).

LAC+USC Medical Center Replacement Project EA/EIR

Mellon & Associates, on behalf of Environmental Science Associates (ESA), conducted a reconnaissance survey of buildings within a one-block radius of the General Hospital main campus. The following buildings listed in Table 3.4-3, *Previously Identified Resources -1999*, were identified as eligible for listing in the National Register and are delineated in the 1999 Environmental Assessment (EA)/Environmental Impact Report (EIR) as well as "National Register Eligibility and Findings of Effects Report, Los Angeles County University of Southern California Medical Center Replacement Hospital," prepared by Mellon & Associates for ESA (ARG 2026 [Appendix E.2]).

Table 3.4-3 Previously Identified Resources – 1999

Building Number	Building Name	Status (Extant/Demolished)
101	Los Angeles General Hospital–Acute Unit	Extant
102	Quality Assurance (Patient's) Building	Extant
103	Payroll (Visitor's) Building	Extant
N/A	Entrance Forecourt	Extant
136, 137	Marengo Street and Zonal Avenue Gateways (East, Center, West)	Extant
N/A	Configuration of North State Street	Extant
604	Pedestrian Tunnel/Tramway (Viaduct) (from Los Angeles General Hospital to Pharmacy)	Extant
502	Pharmacy Building	Extant
508	Old Administration Building	Extant

Source: ARG 2026

The EA/EIR notes that the Payroll (Visitor's) Building, Quality Assurance (Patient's) Building, Entrance Forecourt, Configuration of North State Street, and Marengo Street and Zonal Avenue Gateways are "related directly to the Los Angeles General Hospital–Acute Unit and were constructed concurrently therewith and, therefore, contribute to the historic character of the determined eligible property." The EA/EIR also notes that, with the exception of the Pharmacy Building and Viaduct, buildings comprising the Support Services Site, which had previously been identified as eligible by HRG in 1994, were demolished in 1995 (ARG 2026).

LAC+USC Medical Center Campus Master Plan EIR and Addenda)

ICF International (ICF) conducted a reconnaissance survey of the Campus. ICF concurred with the previous historical resource findings included in the 1999 EA/EIR and delineated in Table 3.4-3 above. Additionally, the survey team identified four potential historical resources that were not previously identified in the 1999 EA/EIR (see Table 3.4-4, *Previously Identified Resources 2014*). These buildings were determined eligible for listing in the California Register and are enumerated below. No new resources were identified in the 2017, 2023, or 2025 addenda to the 2014 Master Plan EIR.

Table 3.4-4 Previously Identified Resources – 2014

Building Number	Building Name	Status (Extant/Demolished)
N/A	Women's and Children's Hospital	Demolished
N/A	Gatehouse associated with Women's and Children's Hospital	Demolished
703	Phinney Hall	Extant
701	Tower Hall	Extant

Source: ARG 2026

HISTORICAL RESOURCES TECHNICAL REPORT 2026

As part of this Draft SEIR, a comprehensive historic evaluation was conducted to confirm and/or update prior findings and studies, given the passage of time and changing conditions on the Project Site. A Historical Resources Technical Report was prepared by ARG (see Appendix E.2). The evaluation organized the Project Site into five distinct areas, including the main campus, and four other areas separated by Mission Road, Zonal Avenue, and/or Marengo Street. A general description of the areas is included below, followed by a table of individual buildings and structures (see Table 3.4-5, *Existing Development within the Project Site*) (ARG 2026 [Appendix E.2]).

- **Area 1:** This area is located between Zonal Avenue to the north, Marengo St to the south, Cumming Street/Chicago Street to the east, Mission Road to the west. This area comprises the main hospital campus and contains a variety of buildings, structures, outbuildings, parking, and site features dating from the early 1900s to the present. This area includes the majority of the active clinical (both inpatient and outpatient) services. The 1933 Los Angeles General Hospital–Acute Unit and its surrounding ancillary buildings and site features comprise the east side of the main campus. The area to the west of the Acute Unit complex and State Street includes the Los Angeles County Medical Examiner's facilities, parking, and support buildings, as well as a few of the oldest extant buildings on the campus. The 2008 Los Angeles General Medical Center Buildings are located to the south of the 1933 Acute Unit complex.
- **Area 2:** This area is located between Alhambra Avenue/railroad tracks to the north, Mission Road to the south, Griffin Avenue to the east, Sichel Street to the west. This area comprises several buildings primarily developed between the 1920s and 1940s and originally used by the College of Osteopathic Physicians and Surgeons, as well as trailers added in more recent decades. The campus currently houses facilities for administration, counseling, social work, facilities support, and clinical support. The area includes the College of Nursing and Allied Health and a surface parking lot.
- **Area 3:** This area is located between Mission Road/Eastlake Avenue to the north, parking lot to the south, juvenile hall to the east, Zonal Avenue to the west. This area includes facilities

management and medical office buildings, as well as ancillary trailers, a utility structure, and a surface parking lot.

- **Area 4:** This area is located between Alhambra Avenue/railroad tracks to the north, Mission Road to the south, Griffing Avenue to the west. This area was previously developed with several medical buildings, all of which have been demolished. It is now a fenced-in vacant lot.
- **Area 5:** This area is located between Marengo Street to the north, Pomeroy Avenue to the south, Brittania Street to the east, Kingston Avenue to the west. This area is completely developed with a multi-level parking structure that connects to the Medical Center on the main campus via a pedestrian bridge.

Table 3.4-5 Existing Development within the Project Site

Building Number	Building Name	Construction Date
Area 1		
101	Los Angeles General Hospital (Acute Unit Building)	1933
102	Patient's Building	1933
103	Visitor's Building	1933
104	Barracks D Building	1940s/50s
105	Barracks G Building/Thrift Shop	1940s/50s
111	Trailer 1 (east) / 3 (west)	1987-88
112	Trailer 126/Patient Financial Services	1970s/80s
120	Mini-Warehouse Building (Supply Chain Operations Receiving)	1984
121	Outpatient Building (OPD)/Building B	1963
122	Intern’s & Resident’s Dormitory Building (IRD)	1965
124	Parking Lot 12	1968-1971
201	Clinic Tower Building	2008
202	Diagnostic & Treatment Building (D&T Building)	2008
203	Inpatient Tower (IPT)	2008
204	East Central Power Plant Building	2008
206	Pedestrian Bridge	2008
302	General Laboratories Building	1967
308	Telephone Exchange Building	1958
309	Trailer 17	1970s/80s
407	Trailer 15	1970s/80s
408	Trailer 8	1970s/80s
410	Parking Lot 10	1972

Table 3.4-5 Existing Development within the Project Site

Building Number	Building Name	Construction Date
502	Pharmacy Building	1917
503	Shed 1 (Pharmacy Trailer)	1970s/80s
506	Trash Compactor	1951
508	Old Administration Building	1910
509	Gatehouse/Angel Interfaith Network	1912
515	Morgue Overflow Crypt	2003
516	West Central Power Plant	1964-65
517	Coroner's Administration Building	1972
518	County of LA Department of Medical Examiner	1972
522	Annex I, II, and III	2000-2003
523	Annex I, II, and III	2000-2003
524	Annex I, II, and III	2000-2003
525	Morgue Overflow Crypts	1989-1992
526	Morgue Overflow Crypts	1989-1992
528	Tram Shop	1989-1992
529	Mason Shop (Tool Crib)	1997-98
531	Morgue Overflow Crypts	1989-1992
538	Shed 2 (Pharmacy Trailer)	2000-03
544	Trailer	2007
604	Viaduct	1933
002	Childcare Center	2023
004	Restorative Care Village	2022
136	Control House	1933
137	Marengo Street and Zonal Avenue Gateways	1933; rebuilt 2000
138	Covered Trash Containers	1990s
534	Cooling Towers	1964-65
536	Tram Shop Storage & Pressure Washer Building	2005
Area 2		
706	Pediatric Outpatient Building/Building 10/E	1957
705	Pediatrics Clinic/Building A	1951
701	Tower Hall/Building 30/B	ca.1928
708	T-60 Building/Building 60	1994
703	Phinney Hall/Building 40	1937
700	North Hall/Leonard Hill Hope Center	1904 (moved 1921/1937)
704	Science Building	1946

Table 3.4-5 Existing Development within the Project Site

Building Number	Building Name	Construction Date
702	Library Building/Building C	ca.1928
707	Building 120	1968-1972
709	Carlson Trailer/Building D	1995
710	Parking Lot 14	1950s/60s
711	Guard Shack	1995
800	1201 Mission Road	1953
Area 3		
900	Facilities Management Building	1956
901	Rand Schrader Clinic/LA General Medical Center Building C	1996
902	BAART Programs Trailer	1988-1992
903	Utility Shack	1950s

Source: ARG 2026 (Appendix E.2)

Notes: Area 4 is vacant and does not have any buildings or structures and Area 5 consists of a modern multi-level parking structure. These areas are not included in the table.

The Technical Report identifies six historical resources—including two eligible historic districts and four individually eligible buildings—on the Project Site, which are listed herein and described in detail below:

- Los Angeles General Hospital–Acute Unit Historic District
- Los Angeles General Hospital–Acute Unit Building (101)
- Old Administration Building (508)
- College of Osteopathic Physicians and Surgeons Historic District
- Tower Hall (701)
- Phinney Hall (703)

Evaluations of Significance: Historic Districts

Los Angeles General Hospital

ARG conducted research and field inspection of the Project Site and considered whether the resources comprising Los Angeles General Hospital might collectively comprise one or more historic districts. In summary, the Los Angeles General Hospital main campus (Area 1) does not constitute a historic district due to a lack of historic integrity.

The main campus is composed of a variety of buildings and structures that were constructed over several decades, from the early 1900s to the present. Los Angeles General Hospital experienced multiple periods of expansion and redevelopment, which resulted in the demolition of buildings and structures from earlier decades, including all of those from its initial construction in the late 19th century. Most notably, over one dozen early 20th century and post–World War II buildings were demolished as a result of damage sustained from the Northridge earthquake. Twelve out of the 14 buildings/structures identified by HRG through their 1994 survey of the "Support Services Site" have been demolished (see Table 3.4-2, *Previously Identified Resources: Support Services Site – 1994*). Furthermore, several large-scale buildings were added to the main campus in 2008, and more are currently under construction (i.e. Phase II of the Restorative Care Village). Per *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, in order for a district to be eligible for designation, it must possess "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." *Bulletin 15* further states that, "A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment." Because the Los Angeles General Hospital Campus has been significantly altered since its original 19th century construction, as well as since its periods of growth in the 1920s/30s and 1950s/60s, and several major intrusions have been added to the Campus as recently as 2023, Los Angeles General Hospital no longer conveys the historic sense of an early to mid-20th century medical Campus. Thus, the Los Angeles General Hospital Campus as a whole does not appear eligible as a historic district (ARG 2026 [Appendix E.2]).

As described above, 12 out of the 14 buildings/structures that were previously identified by HRG as contributors to the "Support Services Site" have been demolished. The two remaining resources are the Pharmacy Building (Building 502) and Viaduct (Building 604). HRG identified the Pharmacy Building and Viaduct as contributors to a potential historic district ("Support Services Site"); they did not identify them as individually eligible for designation. Given the nearly complete demolition of buildings that comprised the Support Services Site, the previously identified potential historic district no longer retains a significant concentration of buildings and structures from General Hospital's early 20th century development. Thus, it does not retain sufficient integrity to convey its significance under federal, state, or local designation criteria. For these reasons, the Pharmacy Building and Viaduct no longer appear to be eligible as contributors to a potential historic district. Furthermore, they do not appear eligible for individual listing or designation (ARG 2026 [Appendix E.2]).

Los Angeles General Hospital–Acute Unit Historic District

The Los Angeles General Hospital–Acute Unit Historic District is eligible for listing in the National Register, California Register, and under the Los Angeles County Historic Preservation Ordinance as a historic district under Criteria A/1/1 and C/3/3 (ARG 2026 [Appendix E.2]). The period of significance under Criterion A/1/1 is 1933-1978, which begins with the date the new hospital

complex opened and formally began serving patients, and ends with the landmark civil rights case, *Madrigal v. Quilligan*, which was filed against the County in response to the more than 200 women, primarily from the Mexican American community, who were forcibly sterilized at Los Angeles General Hospital in the 1960s and 1970s. This civil rights case led to several changes in how the hospital system in California operated and coincided with a rise in Latina activism in the city and more broadly. The period of significance under Criterion C/3/3 is 1933, when construction of the Acute Unit and its related resources were finished and the hospital formally began serving patients in the new facilities. In addition to the Acute Unit, buildings, structures and site features that contribute to the historic district include: North State Street, Marengo Street and Zonal Avenue Gateways, Control House, Entrance Forecourt, Patient's Building, Visitor's Building, Vehicular/Pedestrian Tunnel, and Retaining Walls, all built in 1933.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** The Los Angeles General Hospital–Acute Unit Historic District is associated with the large-scale institutional expansion of County medical services in Los Angeles to address a significant increase in population following World War I. Representatives from the County and Allied Architects toured hospital buildings across the United States to ensure that Los Angeles General Hospital could feature the best ideas and practices from each and represent the most modern embodiment of a public health institution serving the community. The historic district is also associated with landmark civil rights legislation known as *Madrigal v. Quilligan*. On June 7, 1978, Judge Jesse W. Curtis ruled that there was no deliberate intent by the hospital staff to hurt the women and that "sterilizations were the result of miscommunication and language barriers between the patients and the doctors."[8] Nevertheless, the landmark civil rights case led to several changes in how the hospital system in California operated, and ultimately resulted in the State of California revoking their sterilization law. For these reasons, the Los Angeles General Hospital–Acute Unit Historic District is eligible for listing under Criterion A/1/1.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** The historic district does not appear to be eligible under Criterion B/2/2. While there have been notable medical practitioners associated with General Hospital, research did not indicate that any persons significant to the practice of medicine are directly and individually associated with the historic district in a way that would warrant consideration under Criterion B/2/2.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The Los

[8] Library of Congress, "1978: Madrigal v. Quilligan – A Latinx Resource Guide: Civil Rights Cases and Events in the United States," https://guides.loc.gov/latinx-civil-rights/madrigal-v-quilligan accessed August 5, 2025.

Angeles General Hospital–Acute Unit Historic District is a prominent Art Deco-style hospital building designed by the Allied Architects Association. The Acute Unit was designed beginning in the mid-1920s, when Art Deco was at its height of popularity as an architectural style in the United States, particularly in Los Angeles. The building exhibits several character-defining features of the style including vertical forms, complex setbacks, clean lines, and geometric massing. Allied Architects—most notably master architects Edwin Bergstrom, Myron Hunt, Sumner Hunt, Pierpont Davis, and William Richards—was an important partnership in Los Angeles who designed the Acute Unit as part of a larger campaign to make the civic and institutional landscape of Los Angeles more beautiful. The Acute Unit continues to be a prominent visual feature in northeast Los Angeles with its massing and siting on a raised promontory. Furthermore, the majority of buildings in the historic district (11 out of 17, see Table 3.4-6, *Los Angeles General Hospital–Acute Unit Historic District Contributors and Non-Contributors*) retain sufficient integrity to contribute to the significance of the district. Thus, the district is eligible for listing under Criterion C/3/3.

- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** As previously described, the records search and pedestrian survey of the Project Site did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, the potential for subsurface archaeological resources exists. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.
- **Integrity Evaluation.** Although the surrounding area has changed, the Los Angeles General Hospital–Acute Unit Historic District remains the visual centerpiece of the surrounding medical complex and retains its integrity of location and setting. The overall relationship between buildings, centered around an east-west axis with the Acute Unit Building as the focal point, is intact, as are the location, massing, scale, and Art Deco design of its contributing components. The majority of buildings in the complex retain sufficient integrity to contribute to the significance of the district. Thus, the district retains integrity of design, materials, and workmanship, which in turn convey its feeling as an early 20th century hospital complex and association with the early development of health and medicine in Los Angeles. In summary, the historic district retains all seven aspects of integrity.
- **Character-Defining Features.**
  - Elevated promontory site and site plan features

- Spatial relationship of contributing features including Acute Unit, Patient's Building, and Visitor's Building set around a central Entrance Forecourt

Table 3.4-6 Los Angeles General Hospital–Acute Unit Historic District Contributors and Non-Contributors

SEIR Building Number[1]	Building Name	Contributor/Non-Contributor
101	Los Angeles General Hospital–Acute Unit Building	Contributor
136, 137	Marengo Street and Zonal Avenue Gateways	Contributors (4 gateways)
N/A	North State Street	Contributor
N/A	Entrance Forecourt	Contributor
102	Patient's Building	Contributor
103	Visitor's Building	Contributor
N/A	Vehicular/Pedestrian Tunnel	Contributor
N/A	Retaining Walls	Contributor
104	Barracks D	Non-Contributor
105	Barracks G	Non-Contributor
308	Telephone Exchange Building	Non-Contributor
120	Mini-Warehouse Building (Supply Chain Operations Receiving)	Non-Contributor
N/A	Sub-Station	Non-Contributor
002	Childcare Center	Non-Contributor

Source: ARG 2026

Notes:

1. SEIR building numbers were only assigned to above-ground built environment resources. Below-ground structures and landscape/hardscape features, and circulation features were not assigned numbers.

College of Osteopathic Physicians and Surgeon Campus Historic District

The original College of Osteopathic Physicians and Surgeons campus (Area 1) appears to be eligible for listing in the National Register, California Register, and under the Los Angeles County Historic Preservation Ordinance as a historic district under Criterion A/1/1 and under National/California Register Criterion C/3 (ARG 2026 [Appendix E.2]). The period of significance for the potential College of Osteopathic Physicians and Surgeon Historic District begins in 1921,

when the college purchased the property on Griffin Avenue and relocated their existing building to the site (now known as North Hall), and ends in 1968, when the college relocated to the University California, Irvine campus. Following is an evaluation of the college campus under National Register, California Register, and Los Angeles County criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** The College of Osteopathic Physicians and Surgeons campus is associated with the early 20th century development of osteopathic health and medicine in Southern California. Osteopathy was originally introduced in America in the 1870s as a comprehensive therapeutic approach for promoting health and fighting disease. The College of Osteopathic Physicians and Surgeons was formed by the 1914 merger of the two oldest osteopathic colleges in Southern California, and the purpose-built campus on Griffin Avenue was developed over a period in the 20th century when the attitudes of the public and medical establishment evolved from skepticism to broader acceptance of the medical practice. For these reasons, the college campus appears eligible for listing as a historic district under Criterion A/1/1.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** Numerous individuals worked at College of Osteopathic Physicians and Surgeons, conducting research and providing education to students and care to patients. However, no singular significant individuals were found to be directly associated with the campus in a way that would warrant consideration under Criterion B/2/2. Rather, the broad significance of the campus is associated with the college as a research and educational institution; therefore, the campus does not appear eligible for listing under Criterion B/2/2.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The former osteopathic college campus represents a significant and distinguishable entity whose components lack individual distinction. While the campus has undergone some changes over time, including the addition of new landscaping and hardscaping along Griffin Avenue and the addition of new buildings after its period of significance (ending 1968), the property retains its overall character and appearance from when it was developed as a medical college campus in the 1920s through the mid-1950s. Its location at the intersection and Griffin Avenue and North Mission Road, across from the Los Angeles General Hospital main campus, and its overall relationship between buildings, clustered on the east half of the campus, is intact, as are the location, massing, scale, and overall design of its contributing components. Furthermore, the majority of buildings on the property (six out of 10, see Table 3.4-7) retain sufficient integrity to contribute to the significance of the campus. For these reasons, the property represents a significant and distinguishable entity as an early 20th century institutional campus and thus appears eligible as a historic district under

National/California Register Criterion C/3. County of Los Angeles Criterion 3 only relates to a property's architectural style and architect and does not include language referencing a "significant and distinguishing entity whose components may lack individual distinction." Thus, the campus does not appear eligible under local Criterion 3.

Table 3.4-7 College of Osteopathic Physicians and Surgeons Historic District Contributors and Non-Contributors

SEIR Building Number[1]	Building Name	Contributor/Non-Contributor
701	Tower Hall (Building 30/B)	Contributor
702	Library Building (Building C)	Contributor
703	Phinney Hall (Building 40)	Contributor
704	Science Building	Contributor
705	Pediatrics Clinic (Building A),	Contributor
706	Pediatric Outpatient Building (Building 10/E)	Contributor
700	North Hall (Leonard Hill Hope Center)	Non-Contributor
707	Building 120	Non-Contributor
708	T-60 Building (Building 60)	Non-Contributor
709	Carlson Trailer (Building D)	Non-Contributor

Source: ARG 2026

Notes:

1. SEIR building numbers were only assigned to above-ground built environment resources. Below-ground structures and landscape/hardscape features, and circulation features were not assigned numbers.

- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene

fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.

- **Integrity Evaluation.** The College of Osteopathic Physicians and Surgeons Historic District's location at the intersection and Griffin Avenue and North Mission Road is intact. While its setting has somewhat changed through the demolition of institutional buildings to the north and on the Los Angeles General Hospital main campus to the east, as well as the addition of new buildings in the 1970s, 1980s, and 1990s on the campus itself, the campus is still primarily composed of early to mid-20th century institutional buildings generally surrounded by a mix of low-scale institutional, residential, and commercial development. Thus, its integrity of setting has been compromised but not lost altogether. While the campus has undergone some changes over time, including new landscaping and hardscaping and the addition of new buildings as noted above, and the buildings within the property have experienced some alterations (replacement of fenestration, infill of windows on secondary elevations, side/rear additions), the property retains its overall character and appearance from its period of significance (1921-1968). Its overall relationship between buildings, clustered on the east half of the campus, is intact, as are the location, massing, scale, and design of its contributing components. Furthermore, the majority of buildings on the property retain sufficient integrity to contribute to the significance of the campus. Thus, the district retains integrity of design, materials, and workmanship, which in turn convey its feeling as an early 20th century medical college and association with the early development of osteopathic medicine in Los Angeles. In summary, the district retains integrity of location, design, materials, workmanship, feeling, and association, while its integrity of setting has been somewhat compromised.
- **Character-Defining Features:**
  - Siting at the northwest corner of Griffin Avenue and North Mission Road, across the street from the Los Angeles General Hospital main campus
  - Cluster of early campus buildings at the east half of the site, arranged around a central quad (quad has since been altered with addition of the 1994 T-60 Building)
  - Arcaded walkway that surrounds the south and west sides of the central quad wraps around to the front (east) side of Tower Hall

Evaluations of Significance: Individual Buildings

All buildings, structures, and sites on the Project Site that are 45 years old or older[9] were evaluated for listing in the National and California Registers and as a Los Angeles County Landmark and were documented on Department and Parks and Recreation inventory forms (DPR 523A and 523B). Table 3.4-8, *Project Site Age-Eligible Buildings*, identifies the age eligible buildings on the Project Site. As shown in Table 3.4-8, of the 28 resources that are 45 years old or older on the Project Site, ARG identified the following four resources as individually eligible for listing in the National and California Registers and as a Los Angeles County Landmark (see Figure 3.4-1, *Map of Historical Resources on the Project Site*).

- Los Angeles General Hospital–Acute Unit Building (Building 101)
- Old Administration Building
- Tower Hall (Building 701)
- Phinney Hall (Building 703)

As described in the "Historic District Eligibility" section above, two resources—the Pharmacy Building and Viaduct—had previously been identified as contributors to a potential historic district known as the "Support Services Site." However, as described above, the "Support Services Site" was largely demolished in the 1990s and 2000s such that the previously identified historic district no longer retains sufficient integrity to convey its historic significance. Thus, the Pharmacy Building and Viaduct are no longer eligible as contributors to a historic district. However, given this previous finding, ARG has evaluated the Pharmacy Building and Viaduct for eligibility as individual historical resources below (ARG 2026 [Appendix E.2]).

[9] A property must typically be at least 50 years old to be considered potentially eligible as a historical resource. As development projects often have long lead times to construction, a property currently 45 years old will qualify for evaluation as it could become 50 years old by the time a project is completed.

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Table 3.4-8 Project Site Historic Age-Eligible Buildings

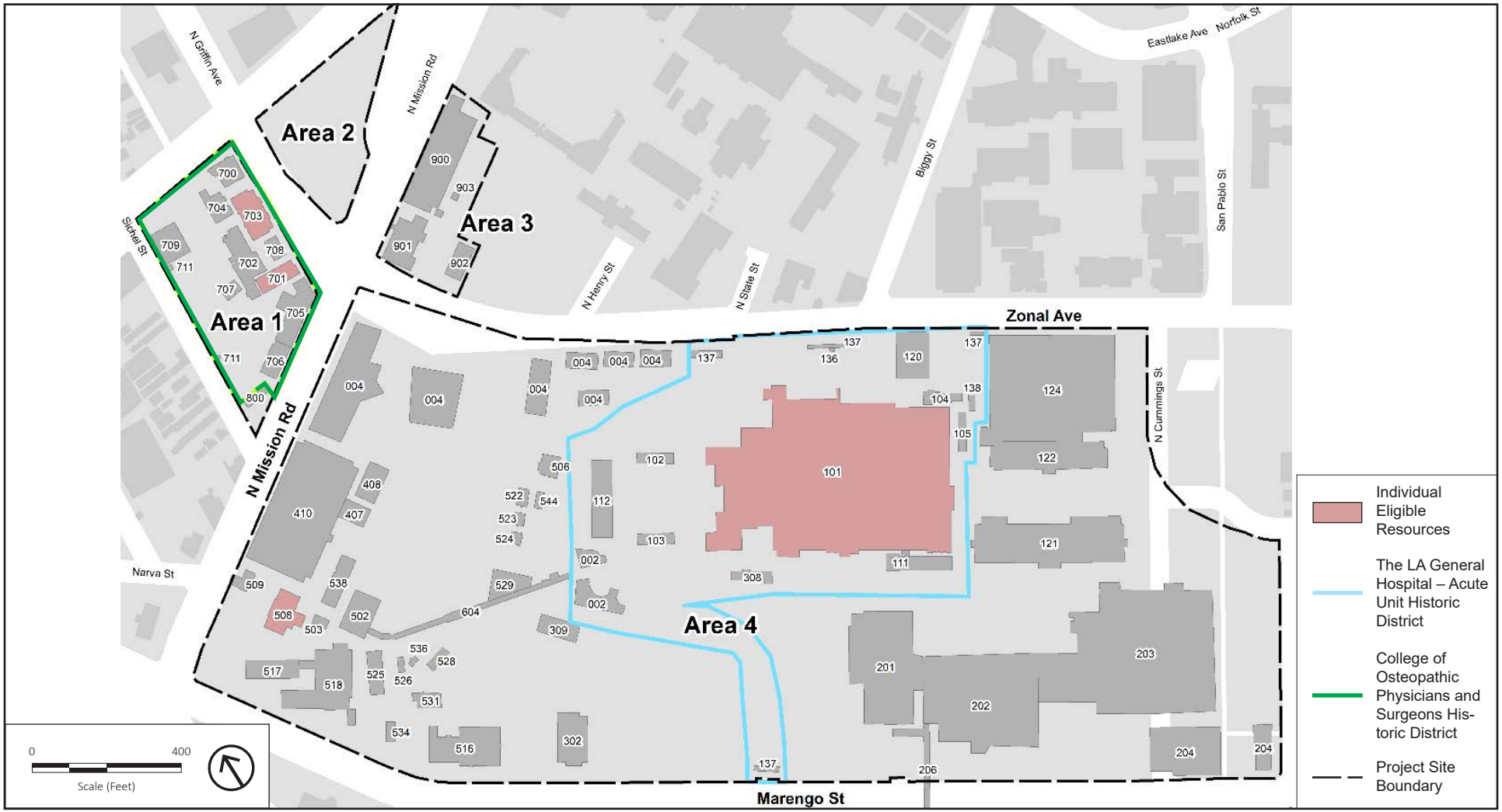
Building Number	Building Name	Construction Date	Architect and Style	Address	Status/Previous Finding	Current Finding
Area 1						
101, 102, 103, 136, 137	Los Angeles General Hospital–Acute Unit	1933	Allied Architects; Art Deco	1200 N. State St	Assigned 2B/2D2 in 1994	Appears individually eligible for listing under NR/CR/local Criteria A/1/1 and C/3/3
104	Barracks D Building	1940s/50s	Unknown; Vernacular	1200 N. State St	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
105	Barracks G Building/Thrift Shop	1940s/50s	Unknown; Vernacular	1200 N. State St	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
121	Outpatient Building (OPD)/Building B	1963	Douglas Honnold, John Rex and Arthur Froehlich; Mid-Century Modern	2010 Zonal Ave	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
122	Intern's & Resident's Dormitory Building (IRD)	1965	Arthur Froehlich; Mid-Century Modern	2020 Zonal Ave	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
124	Parking Lot 12	1968-1971	Unknown; Late Modern	2020 Zonal Ave	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
302	General Laboratories Building	1967	Douglas Honnold and John Rex; Late Modern	1801 N. Marengo St	Found ineligible in 2014 EIR	Appears ineligible for listing under NR, CR, and local criteria
308	Telephone Exchange Building	1958	Orr, Strange & Inslee; Mid-Century Modern	1200 N. State St	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
410	Parking Lot 10	1972	Unknown; Late Modern	1242 N. Mission Rd	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
502	Pharmacy Building	1917	LA County Mechanical Department; Vernacular	1100 N. Mission Rd	Assigned 2D2 as component of Support Services Site in 1994	Appears ineligible for listing under NR, CR, and local criteria
506	Trash Compactor	1951	Unknown; Vernacular	1200 N. State St	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
508	Old Administration Building	1910	Hudson and Munsell; Italian Renaissance Revival	1100 N. Mission Rd	Assigned 2D2 in 1994	Appears individually eligible for listing under NR/CR/local Criteria A/1/1 and C/3/3
509	Gatehouse/Angel Interfaith Network	1912	Unknown; Vernacular	1100 N. Mission Rd	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
516	West Central Power Plant	1964-65	M.A. Nishkian; Vernacular	1635 N. Marengo St	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
517	Coroner's Administration Building	1972	Robert Kliegman; Late Modern	1102 N. Mission Rd	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
518	County of LA Department of Medical Examiner	1972	Robert Kliegman; Late Modern	1104 N. Mission Rd	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
534	Cooling Towers	1964-65	Unknown; Vernacular	1635 N. Marengo St	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
604	Viaduct	1933	Allied Architects; Vernacular	1200 N. State St	Assigned 2D2 as component of Support Services Site in 1994	Appears ineligible for listing under NR, CR, and local criteria

Table 3.4-8 Project Site Historic Age-Eligible Buildings

Building Number	Building Name	Construction Date	Architect and Style	Address	Status/Previous Finding	Current Finding
Area 2						
700	North Hall/Leonard Hill Hope Center	1904, moved 1921/1937	Unknown; Vernacular	1739 Griffin Ave	Found ineligible in 2014 Master Plan EIR	Appears ineligible for listing under NR, CR, and local criteria
701	Tower Hall/Building 30/B	ca.1928	Unknown; Spanish Colonial Revival	1711 Griffin Ave	Assigned 2D2 in 1994	Appears eligible individually under CR/local Criterion 3/3 and as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
702	Library Building/Building C	ca.1928	J.M. Tyler; Mission Revival	1237 N. Mission Rd	Assigned 2D2 in 1994; found ineligible in 2014 Master Plan EIR	Appears eligible as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
703	Phinney Hall/Building 40	1937	Louis L. Dorr; Mediterranean Revival	1721 Griffin Ave	Found eligible in 2014 Master Plan EIR	Appears eligible individually under NR/CR/local Criterion C/3/3 and as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
704	Science Building	1946	Unknown; Spanish Colonial Revival	1733 Griffin Ave	Assigned 2D2 in 1994	Appears eligible as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
705	Pediatrics Clinic/Building A	1951	W.C. Ponnell; Mid-Century Modern	1237 N. Mission Rd	Assigned 2D2 in 1994	Appears eligible as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
706	Pediatric Outpatient Building/Building 10/E	1957	Donald S. Gill and Vincent Palmer; Mid-Century Modern	1237 N. Mission Rd	Assigned 2D2 in 1994	Appears eligible as a contributor to an eligible historic district under NR/CR/local Criterion A/1/1
707	Building 120	1968-1972	Unknown; Vernacular	1237 N. Mission Rd	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
800	1201 Mission Rd	1953	Unknown; Vernacular	1201 N. Mission Rd	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria
Area 3						
900	Facilities Management Building	1956	E.C.N. Brett; Vernacular	1358 Eastlake Ave	Not previously evaluated	Appears ineligible for listing under NR, CR, and local criteria

Source: ARG 2026

Figure 3.4-1 - Map of Historical Resources on the Project Site



Source: Nearmap 2025.

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Los Angeles General Hospital–Acute Unit Building

The Los Angeles General Hospital–Acute Unit Building is eligible for listing in the National and California Registers and as a Los Angeles County Landmark under Criteria A/1/1 and C/3/3 (ARG 2026 [Appendix E.2]). The period of significance under Criterion A/1/1 is 1933-1978, which begins with the date the new hospital complex opened and formally began serving patients, and ends with the landmark civil rights case, *Madrigal v. Quilligan*, which was filed against the County in response to the more than 200 women, primarily from the Mexican American community, who were forcibly sterilized at Los Angeles General Hospital in the 1960s and 1970s. This civil rights case led to several changes in how the hospital system in California operated and coincided with a rise in Latina activism in the city and more broadly. The period of significance under Criterion C/3/3 is 1933, when construction of the hospital complex was finished and the hospital formally began serving patients in the new facilities. Following is an evaluation of the building under National Register, California Register, and Los Angeles County criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** The Los Angeles General Hospital–Acute Unit Building is associated with the large-scale institutional expansion of County medical services in Los Angeles to address a significant increase in population following World War I. Representatives from the County and Allied Architects toured hospital buildings across the United States to ensure that the Acute Unit could feature the best ideas and practices from each and represent the most modern embodiment of a public health institution serving the community. Upon completion, Los Angeles General Hospital was praised as the largest single unit hospital in the world. For these reasons, the Los Angeles General Hospital–Acute Unit Building is eligible for listing under Criterion A/1/1.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** The hospital has had numerous administrators over the decades, including Dr. Phoebus Berman who was the head physician and administrator of the hospital from 1920 to 1956, overseeing a period of expansion that included the construction of the building. However, there is insufficient evidence to demonstrate that Berman or any of these other administrators was historically significant within the broader context of the field of health and medicine. While there have been notable medical practitioners associated with General Hospital, research did not indicate that any persons significant to the practice of medicine are directly and individually associated with the subject building in a way that would warrant consideration under Criterion B/2/2. Therefore, the Acute Unit Building does not appear to be eligible under Criterion B/2/2.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The Los Angeles General Hospital–Acute Unit Building is a prominent Art Deco-style hospital building

designed by the Allied Architects Association. The building was designed beginning in the mid-1920s, consistent with when Art Deco was at its height of popularity as an architectural style in the United States, particularly in Los Angeles. The building exhibits several character-defining features of the style including vertical forms, complex setbacks, clean lines, and geometric massing. The design of the building was understated to reflect its construction during the Great Depression while still having a high level of decoration at its primary west elevation entrance. Allied Architects – most notably master architects Edwin Bergstrom, Myron Hunt, Sumner Hunt, Pierpont Davis, and William Richards – was an important partnership in Los Angeles who designed the Acute Unit as part of a larger campaign to make the civic and institutional landscape of Los Angeles more beautiful. The Acute Unit continues to be a prominent visual feature in northeast Los Angeles with its massing and siting on a raised promontory. Thus, the building is eligible for listing under Criterion C/3/3.

- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.
- **Integrity Evaluation.** Although the surrounding area has changed, with some new infill construction and demolition over time, the subject building remains the visual focal point of the surrounding medical complex and thus retains its integrity of location and setting. Original, significant spaces and character-defining features are largely intact on both the interior and exterior, and the Acute Unit remains an expressive example of monumental, Art Deco-style institutional architecture in Los Angeles. The property thus retains its integrity of design, materials, and workmanship. Through its intact institutional setting as well as its original materials and design features, the property retains its integrity of feeling and association as an early 20th century acute-care hospital and teaching institution. Thus, the property retain all aspects of integrity.

- **Character-Defining Features (Exterior):**
  - Stepped mass and roughly H-shaped floorplan
  - Flat roof with no overhanging eaves
  - Art Deco style, with its emphasis on verticality and a decorative program focused on geometric patterns and foliate ornament, dentil courses, zig-zag reeding, and applied pendants, concentrated near transitions between floors, wall and window openings, and spandrel panels
  - Board-formed concrete walls
  - Rhythmic pattern of steel-framed windows, in a variety of configurations, on each elevation
  - West elevation entrance, and its elaborate ornamentation and materials (including limestone sheathing and sculptural program)
  - Arched window and wall openings, in particular through upper stories and the west-elevation entrance
- **Character-Defining Features (Interior):**
  - West elevation entrance, high-volume one-story foyer, with ashlar pattern limestone wall cladding, tripartite vaulted plaster ceiling with murals by Los Angeles artist Hugo Ballin, geometric-patterned polychrome stone and terrazzo floors, etched engraving in limestone above entrance to lobby, cast aluminum and bronze door frames with angled glass walls with Art Deco-style detailing
  - West elevation entrance, double-height lobby, with terrazzo wainscoting, full-height black marble columns, geometric-patterned polychrome stone and terrazzo floors, ceiling with elaborate decorative detailing, and large steel-framed windows with decorative glass
  - Circulation spaces, including wide, double-loaded corridors lined with terrazzo wainscoting and radius curved floor and wall edges
  - Metallic and ceramic tile floors in surgical spaces, ceramic tile on floors and walls
  - Original hospital features, including wards with nurses' stations, multiple patient rooms, built-in cabinetry, lockers, and ceiling- and wall-mounted clocks
  - Specialized interior spaces, including (but not limited to) the industrial kitchen, auditorium, rehabilitation pool (capped in situ), and pharmacy on the 1st floor; library and morgue on the 2nd floor; and a surgical auditorium with steeply raked seating and arched wall of multi-light steel-framed windows on the 15th-18th floors

Old Administration Building

The Old Administration Building appears eligible for listing in the National and California Registers and as a Los Angeles County Landmark under Criteria A/1/1 and C/3/3 (ARG 2026 [Appendix E.2]). The period of significance under Criterion A/1/1 spans from 1910, when the

building was completed, to 1933, when the completion of the new Acute Unit building marked a new era of development for the hospital campus, and many administrative functions moved into the new building. The period of significance for individual eligibility under Criterion C/3/3 has been identified as 1910, which corresponds to the building's original construction date. Following is an evaluation of the building against National Register, California Register, and Los Angeles County criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** Constructed in 1910 as the main administrative building for Los Angeles County Hospital (later the Los Angeles County General Hospital), the building appears to be eligible under Criterion A/1/1 for its association with early institutional development in health and medicine. It is the oldest extant building associated with the development of the hospital. The building is associated with the second wave of development on the hospital campus, and was built at the beginning of a period from the 1910s to the 1930s, during which the hospital grew rapidly to accommodate the region's growing population.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** The building is not associated with the lives of persons significant in our past. Numerous individuals worked in the building, providing administrative services to the hospital. However, no singular significant individuals were found to be directly associated with the building in a way that would warrant consideration under Criterion B/2/2.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The Old Administration Building appears to be significant under Criterion C/3/3 as an excellent example of Italian Renaissance Revival institutional architecture and as an example of the work of master architects Hudson & Munsell. The Italian Renaissance Revival style was based upon the classically inspired architecture developed in Italy during the artistic, architectural, and literary movement of the 14th through 16th centuries that was spurred by the rebirth of interest in the ideals and achievements of imperial Rome. Throughout the 1920s and 1930s, the style was frequently used for imposing civic buildings, institutional buildings, and banks, and in some cases for grand private residences. The Old Administration Building exhibits the distinctive features of the Italian Renaissance Revival style including a symmetrical façade, formal composition, low-pitched hipped roof, overhanging eaves with decorative brackets, brick walls, elaborate primary entrance, and decorative cast stone. The building was designed by the prominent local architecture firm Hudson & Munsell, a firm that has been recognized as masters in their field for their significant contributions to Los Angeles's built environment. Among other buildings by Hudson & Munsell are the National Register-listed Natural History Museum (1913) and several local Historic-Cultural

Monuments, including the Charles I.D. Moore Residence (1905), Secondo Guasti House (1910), Fire Station #1 (1910), Dr. Grandville MacGowan Home (1912), and Briggs Residence (1912). The Old Administration Building demonstrates the firm's command of revival style architecture and is a notable example of their institutional work. Built in 1910, the building exhibits a high quality of design and distinctive characteristics of the Italian Renaissance Revival style institutional architecture.

- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.
- **Integrity Evaluation.** The building remains in its original location on the Los Angeles General Hospital main campus. Exterior alterations have been limited to a sensitive rear addition that was compatibly designed to minimize removal of character-defining features and is not visible from the primary façade. Almost all of the building's original architectural materials and features are intact, and thus the building retains integrity of design, materials, and workmanship. While the building's setting has been compromised with the demolition of nearly all early 20th century buildings on the west half of the hospital's main campus and the construction of new buildings, the building retains its original siting on North Mission Road and its general institutional surroundings. Thus, the property retains its integrity of feeling and association as an early 20th century administration building on a hospital campus. In summary, the building retains integrity of location, design, materials, workmanship, feeling and association. Its integrity of setting has been compromised.
- **Character-Defining Features:**
  - Siting along North Mission Road, at the west end of the Los Angeles General Hospital main campus
  - Rectangular form and massing
  - Hipped roof with overhanging eaves and decorative wood brackets

- Octagonal cupola
- Prominent stepped parapet at primary façade
- Brick cladding
- Fenestration pattern, including one-over-one double-hung wood windows
- Recessed entry vestibule, including square columns, marble panels, and wood doors, sidelights, and transoms
- Wide entrance steps and side walls
- Cast stone ornamentation including quoining, dentils, shields, corbels, and window surrounds

Tower Hall

Tower Hall appears to be individually eligible for listing in the California Register and as a Los Angeles County Landmark under Criterion 3/3. It also appears to be eligible as a contributor to the eligible College of Osteopathic Physicians and Surgeons Historic District under Criterion A/1/1 (ARG 2026 [Appendix E.2]). The period of significance for individual eligibility under Criterion 3/3 has been identified as circa 1928, which corresponds to the building's approximate construction date. Following is an evaluation of the building under National Register, California Register, and Los Angeles County criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** Tower Hall is a one-story building with a prominent tower constructed by the College of Osteopathic Physicians and Surgeons circa 1928 as an auditorium. While Tower Hall contributes to the significance of the College of Osteopathic Physicians and Surgeons Historic District as an early example of institutional development in health and medicine in Southern California, the building does not appear to be individually significant under Criterion A/1/1. There is no evidence that the building is associated with any singular event. It is one of multiple early purpose-built buildings on the campus and is not singularly significant for its association with the research or educational functions of the college such that it would have individual distinction under Criterion A/1/1. The broad significance of research and education in osteopathy associated with the College of Osteopathic Physicians and Surgeons is best conveyed by the institutional campus as a whole.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** As an assembly building, no singular significant individuals were found to be directly associated with the building in a way that would warrant consideration under Criterion B/2/2. Thus, it does not appear to be eligible under this criterion.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant**

and distinguishable entity whose components may lack individual distinction. Tower Hall appears to be significant under Criterion 3/3 as an excellent local example of Spanish Colonial Revival institutional architecture. Spanish Colonial Revival architecture gained widespread popularity throughout Southern California after the 1915 Panama-California Exposition in San Diego. Tower Hall exhibits the distinctive features of the Spanish Colonial Revival style including an asymmetrical façade, stucco cladding, gabled roof with clay tile roofing, prominent tower, arched window openings, and cast stone ornamentation. Reflecting the eclectic influences often incorporated into Spanish Colonial Revival architecture, the walkway that surrounds Tower Hall has a Mission Revival style arcade. While the architect or builder is unknown, Tower Hall exhibits a high quality of design and distinctive characteristics of Spanish Colonial Revival design as applied to an institutional auditorium, and is the visual and aesthetic anchor of the campus. For the above reasons, Tower Hall appears eligible for listing in the California Register and as a Los Angeles County Landmark under Criterion 3/3. However, as described in its evaluation of integrity below, the building has undergone multiple alterations such that it does not retain sufficient integrity to be individually eligible under National Register Criterion C.

- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.
- **Integrity Evaluation.** Tower Hall retains its original location along Griffin Avenue on the historic College of Osteopathic Physicians and Surgeons campus. While its setting has somewhat changed through the re-grading of Griffin Avenue and the addition of new buildings on the campus in the 1970s, 1980s, and 1990s, Tower Hall is still primarily surrounded by early 20th century buildings comprising the osteopathic college campus. Thus, its integrity of setting has been compromised but not lost altogether. The building retains its original Spanish Colonial Revival design, as evidenced through its rectangular massing, prominent entry tower, gabled clay tile roof, cast stone decorative detailing, and

arched fenestration. The building has experienced a number of material alterations, including several infilled and replaced windows on side elevations, replacement primary entrance door, and re-stuccoing with a more textured stucco, which have somewhat compromised its integrity of materials. However, because the overall design of the building is intact and it retains some of its original materials, including clay tile roofing, cast stone detailing, and some multi-light wood windows, Tower Hall retains its overall integrity of workmanship from its historical period. Because the building retains its original location, design and workmanship, and its integrity of setting and materials has not been altogether lost, Tower Hall is still able to convey its historic feeling as a 1920s Spanish Colonial Revival institutional building and association with the early development of the osteopathic college. Given the alterations described above, the building's integrity has been diminished such that it is not eligible for listing in the National Register. However, based on the greater flexibility for assessing the integrity of a historical resource for state and local designation as compared to potential listing in the National Register, the building retains sufficient integrity to qualify for individual listing in the California Register and as a Los Angeles County Landmark.

- **Character-Defining Features:**
  - Siting and orientation along Griffin Avenue, on the east half of the historic osteopathic campus
  - Rectangular form and massing
  - Gabled roof with clay tile roofing
  - Square tower with hipped roof, clay tile cladding, and cast stone ornamentation around arched openings and round balconettes
  - Stucco cladding
  - Cast stone entrance surround and other decorative ornamentation
  - Fenestration pattern, including arched window openings, original wood windows with arched transoms, and original multi-light casement windows
  - Mission Revival style arcaded walkway that fronts the building to the east

Phinney Hall

Phinney Hall appears to be individually eligible for listing in the National and California Registers and as a Los Angeles County Landmark under Criterion C/3/3. It also appears eligible as a contributor to the eligible College of Osteopathic Physicians and Surgeons Historic District under Criterion A/1/1. The period of significance for individual eligibility under Criterion C/3/3 has been identified as 1937, which corresponds to the building's construction date. Following is an evaluation of the building under National Register, California Register, and Los Angeles County criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: Associated with events that have made a significant contribution to the broad patterns of history.** Phinney Hall is a two-story building constructed by the College of Osteopathic Physicians and Surgeons in 1937. The building was constructed to house various laboratories, classrooms, and assembly uses. While Phinney Hall contributes to the significance of the College of Osteopathic Physicians and Surgeons Historic District as an early example of institutional development in health and medicine in Southern California, the building does not appear to be individually significant under Criterion A/1/1. There is no evidence that the building is associated with any singular event, and it is not the oldest or primary building associated with the college such that it would have individual distinction under Criterion A/1/1. The broad significance of research and education in osteopathy associated with the College of Osteopathic Physicians and Surgeons is best conveyed by the institutional campus as a district.
- **National Register, California Register, Los Angeles County Criterion B/2/2: Associated with the lives of persons significant in our past.** Numerous individuals worked in the building, providing education to students and care to patients. However, no singular significant individuals were found to be directly associated with the building in a way that would warrant consideration under Criterion B/2/2. Thus, it does not appear eligible under this criterion.
- **National Register, California Register, Los Angeles County Criterion C/3/3: Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** Phinney Hall appears to be significant under Criterion C/3/3 as an excellent example of Mediterranean Revival institutional architecture, with unique Art Deco influences. Phinney Hall exhibits the distinctive features of the Mediterranean Revival style including a symmetrical façade, stucco cladding, low-pitched hipped roof with clay tile roofing, and an elaborate, decorative entrance. It is further distinguished by the more geometric quality of the ornamentation around the primary entrance, which borrows influences from the Art Deco style. Art Deco style zigzag and geometric motifs are also utilized at several of the windows. Phinney Hall was designed by architect Louis L. Dorr, who worked on a number of notable projects in Los Angeles, including the Biltmore Hotel (1922), while working for the New York-based firm Schultz and Weaver, as well as for the Art Deco style Westward Ho Hotel in Phoenix, Arizona in collaboration with the firm Fisher, Lake, and Traver. However, Dorr has not been individually recognized as a master in the field of architecture. Built in 1937, Phinney Hall exhibits a high quality of design and distinctive characteristics of Mediterranean Revival design that responds to the existing context of the earlier Spanish Colonial and Mission Revival style buildings on the campus, while incorporating more modern Art Deco influences.
- **National Register, California Register, Los Angeles County Criterion D/4/4: Has yielded or may likely yield information important in prehistory or history.** Envicom conducted an

archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.

- **Integrity Evaluation.** Phinney Hall retains its original location along Griffin Avenue on the historic College of Osteopathic Physicians and Surgeons campus. While its setting has somewhat changed through the re-grading of Griffin Avenue and the addition of new buildings on the campus in the 1970s, 1980s, and 1990s, Phinney Hall is still primarily surrounded by early 20th century buildings comprising the osteopathic college campus. Thus, its integrity of setting has been compromised but not lost altogether. Exterior alterations to the building have been limited to very minor changes such as the addition of an accessible ramp and window security bars, and door replacements. The majority of its distinctive materials, features, and ornamentation associated with its Mediterranean Revival style have been retained. The building thus retains its integrity of design, materials, and workmanship. Through its intact original materials and design features, the property retains its integrity of feeling and association as an early 20th century institutional building associated with the early development of the osteopathic college.
- **Character-Defining Features:**
  - Siting and orientation along Griffin Avenue, on the east half of the historic osteopathic campus
  - Rectangular form and massing
  - Low-pitched hipped roof forms with clay tile roofing and central flat roof
  - Front-facing gabled parapet with sculptural, geometric finials
  - Stucco cladding
  - Stringcourses
  - Fenestration pattern, including original multi-light steel windows
  - Ornamental cast stone surround at primary entrance
  - Art Deco style zigzag decorative motifs at the building corners

Pharmacy Building

The Pharmacy Building does not appear individually eligible under any local, state, or federal registration criteria (ARG 2026 [Appendix E.2]).

- **National Register, California Register, Los Angeles County Criterion A/1/1: associated with events that have made a significant contribution to the broad patterns of history.** The Pharmacy Building is generally associated with the institutional expansion of County medical services in Los Angeles in the late 1910s to address the region's significant population increase leading up to and immediately following World War I. Constructed in 1917, it was originally known as the "service building" and was used for patient and employee dining. The building was historically part of a larger complex of support services buildings, including a carpenter shop, electric shop, repair shop, sheet metal shop, laundry, and powerhouse. The "Support Services Site" was identified as eligible for listing in the National Register as a historic district through the Section 106 process following the 1994 Northridge earthquake (see Section 6.1). Fourteen buildings were identified as "contributors" to the "Support Services Sites" at that time. However, nearly all the support services buildings were demolished in the late 1990s and 2000s such that the site, which historically comprised the west half of the Los Angeles General Hospital main campus, no longer retains a significant concentration of contributing buildings to be eligible for National Register listing. Specifically, of the 14 identified contributors, only two—the Pharmacy Building and Viaduct—remain. While associated with the General Hospital's early 20th century development, according to National Register Bulletin 15, "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well." The building was historically and continues to be used as a support building (originally used as a dining facility and converted for pharmacy and storage use in the 1950s). As a support building that did not hold any significant or unique medical-related functions, the building is not singularly important or illustrative of the General Hospital's 1910s development and expansion as a significant medical institution. Rather, the Acute Init itself (described above), which is still extant, better conveys this notable pattern of history. For these reasons, the Pharmacy Building does not appear individually eligible for listing under Criterion A/1/1.
- **National Register, California Register, Los Angeles County Criterion B/2/2: associated with the lives of persons significant in our past.** The building is not associated with the lives of persons significant in our past. Originally a dining facility for Los Angeles General Hospital employees and patients and later used as a pharmacy and storage, numerous individuals have dined in and worked at the building since its construction. However, no significant individuals were found to be directly associated with the building in a way that would warrant consideration under Criterion B/2/2. Therefore, the Pharmacy Building does not appear to be individually eligible under Criterion B/2/2.

- **National Register, California Register, Los Angeles County Criterion C/3/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The Pharmacy Building is a modest, vernacular building. It does not embody the distinctive characteristics of a particular architectural style and does not possess high artistic value. It was built using typical materials (brick and concrete) and methods of construction common of the period. It is one of several dozen of extant early 20th century vernacular brick and concrete buildings located near downtown Los Angeles. Furthermore, the building has undergone multiple alterations, including infill of two bays at the second and third stories of the west elevation in 1997; demolition of an adjoining building to the north and infill of lower bays and windows around 1995; infill of some window openings with glass block; replacement of doors; and the addition of air conditioning units, canopies, metal security bars at windows, and metal reinforcing ties at the parapet. These changes have compromised the building's ability to convey its original design intent. While the specific architect at the Los Angeles County Mechanical Department who designed the building is unknown, given its modest, altered appearance, it cannot be said that the building represents the work of a master. As described above, the Pharmacy Building was once part of a larger complex of support services buildings on the west half of the Los Angeles General Hospital main campus. The "Support Services Site" was identified as eligible for National Register listing by HRG in 1994, presumably for representing a significant and distinguishable entity whose components lacked individual distinction. However, 12 out of the 14 buildings/structures that were identified by HRG and comprised the "Support Services Site" were demolished in the late 1990s and 2000s (see Table 6). Because the vast majority of buildings and structures that historically comprised the site have been demolished, the site no longer contains a significant concentration of buildings or structures to be eligible for designation. For the above-stated reasons, the Pharmacy Building does not appear eligible for listing under Criterion C/3/3.
- **National Register, California Register, Los Angeles County Criterion D/4/4: has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously

undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.

Viaduct

The Viaduct does not appear individually eligible under any local, state, or federal registration criteria.

- **National Register, California Register, Los Angeles County Criterion A/1/1: associated with events that have made a significant contribution to the broad patterns of history.** The Viaduct is generally associated with the institutional expansion of County medical services in Los Angeles in the 1930s to address the region's significant population increase during the interwar years. Constructed in 1933, the structure originally served as a means of transporting hospital employees and supplies to and from the newly built Los Angeles General Hospital–Acute Unit, connecting it with support buildings to the west. It was part of an above- and below-ground circulation network connecting various buildings and structures throughout the expansive hospital campus. The structure was historically part of a larger complex of support services buildings known as the "Support Services Site" and described above. While associated with the General Hospital's 1930s development, according to National Register Bulletin 15, "Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well." The Viaduct was historically and continues to be used as a support structure as part of a much larger complex of medical buildings that support the hospital complex, many of which no longer exist. As a support structure, it is inherently not singularly important or illustrative of the General Hospital's 1930s development and expansion as a significant medical institution. For these reasons, the Viaduct does not appear individually eligible for listing under Criterion A/1/1.
- **National Register, California Register, Los Angeles County Criterion B/2/2: associated with the lives of persons significant in our past.** Properties that are eligible under Criterion B/2/2 are typically habitable buildings where an important person worked or resided and that have a direct association with the person's reason(s) for significance. As a non-inhabitable structure, it cannot be said that the Viaduct has any direct or meaningful connection to the productive life of an individual. Therefore, the Viaduct does not appear to be individually eligible under Criterion B/2/2.
- **National Register, California Register, Los Angeles County Criterion C/3/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.** The Viaduct is utilitarian and vernacular in appearance and does not possess high artistic value. While it

embodies the typical characteristics of the property type (elevated linear structure supported by a series of consecutive arches), it was built using common materials and methods of construction of the period (poured-in-place, board-formed concrete with steel reinforcement). Furthermore, the viaduct has been altered since its original construction, including the demolition of an elevated branch that ran perpendicular to the main section and connected to a laundry building (also demolished); infill of most support arches with wood and corrugated metal cladding and doors; and replacement of windows at grouped openings along the elevated enclosed corridor. These alterations have compromised the Viaduct's ability to convey its original design intent. The structure was designed by the Allied Architects Association of Los Angeles, who concurrently designed the Los Angeles General Hospital–Acute Unit and are considered to be master architects. However, given its utilitarian construction and altered appearance, it cannot be said that the Viaduct is singularly or notably representative of their work as masters in their field. As described above, the Viaduct was once part of a larger complex of support services buildings on the west half of the Los Angeles General Hospital main campus. The "Support Services Site" was identified as eligible for National Register listing, presumably for representing a significant and distinguishable entity whose components lacked individual distinction. However, the vast majority of buildings and structures that historically comprised the site were demolished in the late 1990s and 2000s such that the site no longer contains a significant concentration of buildings or structures to be eligible for designation. For the above reasons, the Viaduct does not appear eligible under Criterion C/3/3.

- **National Register, California Register, Los Angeles County Criterion D/4/4: has yielded or may likely yield information important in prehistory or history.** Envicom conducted an archaeological assessment that included a records search and pedestrian survey. The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits were observed within a limited remnant hill area, indicating the potential for subsurface archaeological resources. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American resources could have been impacted without recordation. The Natural History Museum of Los Angeles County records search was negative for fossil resources on the Project Site; however, vertebrate Pleistocene fossils have been recovered from adjacent localities, and Miocene fossils have been identified within the broader area. While no known archaeological resources were identified, the Project Site retains moderate sensitivity for previously undiscovered subsurface archaeological resources. Accordingly, archaeological deposits, if present, could have the potential to yield information important in prehistory or history and could meet the eligibility criteria under National Register Criterion D, California Register Criterion 4, or Los Angeles County Criterion 4.

Historical Resources in the Vicinity of the Project Site

In addition to the features located within the Project Site, the following historical resources are within the vicinity of the Project Site. For purposes of this analysis, "vicinity" means properties within one block of the boundaries of the Project Site (ARG 2026 [Appendix E.2]). These resources were identified through ARG's search in California's Built Environment Resource Directory (BERD) and the City of Los Angeles' HistoricPlacesLA (HPLA) historical resources inventory database. No additional historical resources were identified through Envicom's search through the South Central Coastal Information Center (SCCIC) (ARG 2026).

- **Raulston Medical Research Building (2025 Zonal Avenue).** 1952 Late Modern medical building designed by Raimond Johnson and Albert C. Martin & Associates and located on the USC School of Medicine campus. Identified as potentially eligible through the Adelante Eastside Redevelopment Project Area Historic Resources Survey.
- **Seely Wintersmith Mudd/McKibben Hall (1333 San Pablo Street).** 1961 Corporate Modern medical building designed by Flewelling & Moody and located on the USC School of Medicine campus. Identified as potentially eligible through the Adelante Eastside Redevelopment Project Area Historic Resources Survey.
- **Mixed-use commercial Building (1143 N. Mission Road).** Vernacular mixed-use commercial building constructed in 1926. Identified as potentially eligible through the Adelante Eastside Redevelopment Project Area Historic Resources Survey.
- **Neighborhood Market (1000 N. Clement Street).** Vernacular commercial building constructed in 1930. Identified as potentially eligible through the SurveyLA survey.

ARCHAEOLOGICAL RESOURCES

2025 Archaeological Survey

In addition to the historic evaluation, a Phase I archaeological resources assessment was conducted as part of this Draft SEIR (Envicom 2026 [Appendix E.1]). Envicom completed a systematic pedestrian survey by a qualified archaeologist of the Project Site on July 18, 2025 and on August 8, 2025. The purpose of a cultural resource pedestrian survey is to identify any cultural resources located on the surface of the Project Site that have not previously been identified or recorded. During the pedestrian survey, any previously recorded cultural resources are also revisited and assessed, with new site maps being updated as needed (Envicom 2026 [Appendix E.1]). The survey did not identify any surface-level prehistoric or older historical archaeological resources on the Project Site; however, intact bedrock and alluvial deposits observed on the Project Site indicate the potential for subsurface archaeological resources. During the survey, no Native American resources were detected. Historic development of the site has most likely disturbed or destroyed Native American resources that were present on the Project Site. Because much of the Project Site was developed prior to the 1950s, before the enactment of modern archaeological resource protection laws, prehistoric Native American

resources could have been impacted without recordation. The Project Site has the potential to contain previously undiscovered subsurface archaeological resources given results of record searches, review of data, and prior history of development as described in this chapter.

The pedestrian survey was conducted in accordance with Secretary of the Interior's Standards and Guidelines for Archaeological and Historic Preservation (48 FR 44716, Sept. 29, 1983). The systematic survey follows five-meter transects where possible but can transition into opportunistic examination of the landscape where site features do not allow for systematic walking. Opportunistic examination also takes place in more open areas, or locations where rodent disturbance or erosion can provide an understanding of the site subsurface conditions (Envicom 2026 [Appendix E.1]).

During the site survey, notation of the site conditions, disturbances, or modern features are made. Site soils, vegetation, and natural impacts are also recorded. Visibility of the ground surface is noted, as are any other conditions that influenced the accuracy of the site survey, such as time of year, weather conditions, or homeless encampments (Envicom 2026 [Appendix E.1]).

Any artifacts or features encountered are photographed, mapped, measured, or otherwise recorded in such a way that a general temporal range of occupation can be made for any observed cultural resources. Normally, no artifacts are removed from the Project Site. However, if additional site visits are planned, artifacts may be removed for cleaning to better record individual items for later interpretation of the site(s). Cleaned artifacts will then be returned to the Project Site to the general location of original discovery. In the case that a site assessment will progress to a Phase II evaluation, artifacts may be curated to add to later study collections (Envicom 2026).

Database Records Searches and Map Review

Envicom conducted an on-site visit to the South Central Coastal Information Center (SCCIC) to conduct a records search of the California Historical Resources Information System (CHRIS) database for Los Angeles County. Envicom completed the SCCIC record search on July 23, 2025 and obtained the records for all cultural resource sites and report previously completed for the Project Site and for the surrounding 0.5-mile study area. Additionally, a request was made to the Native American Heritage Commission (NAHC) on July 15,2025, to search their Sacred Land Files for Tribal Cultural Resources (TCRs) that are located on or within the Project Site or the surrounding 0.5-mile study area (Envicom 2026 [Appendix E.1]). Fifty-nine USGS historical maps that include the Project Site were also reviewed.

The findings from the SCCIC record search indicated that three previously recorded cultural resources were located on the Project Site; all three of the cultural resources located within the Project Site are historic buildings, as previously described. No archaeological resources are recorded within the Project Site. The record search also showed a history of intensive modern

development within the Project Site that included demolition and grading that may reduce the chance for intact native soils or older historical artifacts or features being present (Envicom 2026 [Appendix E.1]).

The SCCIC identified nine cultural resources that were recorded within the surrounding 0.5-mile study area. Five of these resources were determined to be in proximity to the Project Site. One resource is a historic-era artifact scatter that dates to between 1900 and 1920; the other four resources are historical buildings, as previously described. The remaining cultural resources located within the 0.5-mile study area included an older historical refuse pit dating to roughly 1900, a mixed deposit of older historical material and construction material dating to between the 1920s and 1950s, a historical plaque, and a negative findings report (Envicom 2026 [Appendix E.1]).

The results from the NAHC record search were received on July 25, 2025, with positive findings. The County is required to perform tribal consultation pursuant to Assembly Bill (AB) 52, and the NAHC letter is part of the Native American consultation record. Chapter 3.16, *Tribal Cultural Resources*, of this Draft SEIR discusses the tribal consultation process pursuant to AB 52.

3.4.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines states that the proposed project would result in a significant impact on cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

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

The Appendix G cultural resources checklist used at the time of the 2014 Master Plan EIR included paleontological resources within the Cultural Resources significance criteria. The current (2025) Appendix G includes paleontological resources within the Geology and Soils section, reflecting updated Office of Planning and Research guidance that treats fossil resources as part of the geologic environment rather than as cultural resources. Accordingly, this Draft SEIR addresses potential impacts to paleontological resources within Chapter 3.6, *Geology and Soils*, of this Draft SEIR.

METHODOLOGY

This analysis evaluates the Proposed Project against the aforementioned significance criteria/thresholds for determining the level of significance of cultural resources impacts. The impact conclusions consider the potential for changes in environmental conditions, as well as compliance with the existing regulatory framework (i.e., laws, ordinances, regulations, and standards that avoid or reduce the potentially significant environmental impacts). Where significant impacts remain despite compliance with the regulatory framework, feasible mitigation measures are recommended to avoid or reduce the Proposed Project's potentially significant environmental impacts. The determination that the Proposed Project would or would not result in "substantial" adverse effects on historical and archaeological resources and human remains considers the existing Project Site's historical resource value and the severity of the Proposed Project implementation on resources that may be considered historical. Significant impacts on historical resources would occur when the resources are demolished or when the characteristics that convey the resources' historical significance are materially altered.

In addition to threshold established by CEQA, the NPS provides standards and guidance for the appropriate treatment of historical resources that can be helpful in evaluating impacts. These standards and guidelines are also applied by the California Office of Historic Preservation and the NPS in review of projects being considered for Historic Tax Credits. These standards are included in Section 3.4.1 of this chapter.

For the purposes of this analysis, "adjacent" is defined as directly next to without any physical or visual separation. Physical or visual separation may be topographic changes or elements of the built environment, such as streets or other buildings.

Historical Resources

Methodology employed in the preparation of the Historic Resources Technical Report included the following efforts:

- A qualified professional that meets the Secretary of the Interior's Professional Qualifications Standards, 36 CFR Part 61, in the discipline of Architectural History, conducted a site visit of the entire 81.9-acre Project Site on September 22, 2025. During this time, all age-eligible buildings and site features were photographed and notes were taken on their physical appearance and condition.
- The findings of the SCCIC records search referenced above were reviewed, and a search in California's Built Environment Resource Directory (BERD) and the City of Los Angeles's HistoricPlacesLA (HPLA) historic resources inventory database was conducted for previous surveys and evaluations of the Project Site and surrounding properties.
- State and local technical bulletins, ordinances, and other materials related to the evaluation of historical resources were reviewed.

- Primary and secondary source research related to the history of the Los Angeles County General Hospital Campus and all improvements within the Project Site was conducted.
- All age-eligible buildings were evaluated against eligibility criteria of the National Register of Historic Places and California Register of Historical Resources.
- The Proposed Project was analyzed to determine whether it would result in any potential impacts to historical resources under CEQA.
- A comprehensive literature review of numerous documents related to the history of the Project Site was conducted (see Appendix E.1).

Project Design Features: General Hospital–Acute Unit District and Building

As described in Chapter 2, *Project Description*, any future development activities under the Proposed Project that are within the Acute Unit Historic District boundaries would be required to include the following Project Design Features (PDFs) specific to the treatment of these historical resources. These PDFs, through implementation of the Proposed Project, are required to facilitate the ongoing Proposed Project's compliance with the Secretary of the Interior's Standards for Rehabilitation (Rehabilitation Standards). The County is pursuing federal historic preservation tax incentives for the Acute Unit's proposed rehabilitation work, which requires rigorous review by the National Park Service and California Office of Historic Preservation for compliance with the Rehabilitation Standards.

The following PDFs, as described in Chapter 2, *Project Description*, will be included as part of the Proposed Project.

PDF 1

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

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

PDF 2

Prior to commencement of any construction activities associated with the Los Angeles General Hospital–Acute Unit Building's exterior or interior character-defining features,[10] or the Acute Unit Historic District's contributing features (Patient's and Visitor's buildings, retaining walls, gateways, State Street, Forecourt, tunnel), a Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to monitor all disassembly, construction and rehabilitation activities, to ensure appropriate treatment of exterior and interior character-defining features, materials, and spaces during the construction project.

PDF 3

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

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

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

- **Historical Narrative:** An architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards shall compile historical background information relevant to the historical resource and prepare a narrative.

Project Design Features: Support Services Site

The Proposed Project also includes PDFs related to the Support Services Site, which was previously identified as an eligible historic district. While the Support Services Site was largely demolished in the late 1990s and 2000s and no longer retains sufficient integrity to convey its significance as a historic district, the site played an important role in the history and development of the hospital. The Pharmacy and Viaduct, which had been identified as contributors to the Support Services Site, are the only remaining vestiges of the Support Services Site and would be demolished under the Proposed Project. The following PDFs will document and interpret these resources and their associations with the history and development of Los Angeles County General Hospital.

The following PDFs are described in Chapter 2, *Project Description*, and will be included as part of the Proposed Project.

PDF 4

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

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

- **Historical Narrative:** An architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards shall compile historical background information relevant to the historical resource and prepare a narrative.

PDF 5

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

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR provides a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future development and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.4.4, *Project Impact Analysis*, and 3.4.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would result in significant and unavoidable impacts related to changes to historical resources. Specifically, the 2014 Master Plan determined that development under the 2014 Master Plan could result in impacts on individual historical resources including but not limited to the following:

- Demolition of Women's and Children's Hospital
- Alterations to Los Angeles General Hospital Retaining Walls
- Alterations to Setting of State Street
- Impact on Viaduct/Pedestrian Tunnel
- Impacts on Old Administration Building and Service Building

The 2014 Master Plan EIR concluded that demolition of the Women's and Children's hospital or other historical resources such as the associated gatehouse would be significant and unavoidable. The 2014 Master Plan EIR determined that the Cultural Resources mitigation measures identified in the 2014 Master Plan may reduce impacts due to alteration or removal of contributing features in the Los Angeles General Hospital setting to a less than significant

level. The 2014 Master Plan EIR stated that a determination cannot be made until individual development projects are proposed, further historical analysis of the Los Angeles General Hospital setting has been completed, and the extent of potential alterations to the contributing features are identified. Table 3.4-9, *Summary of the 2014 Master Plan EIR Cultural Resources Impact Conclusions*, provides an overview of previous cultural resources impact analyses for the Campus.

Table 3.4-9 Summary of the 2014 Master Plan EIR Cultural Resources Impact Conclusions

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
CR-1: Cause a substantial adverse change in the significance of historical resource, as defined in Section 15064.5 of the State CEQA Guidelines.	Potentially Significant (construction) No Impact (operation)	MM-CR-1 through MM-CR-7	Significant and Unavoidable (construction)
CR-2: Cause a substantial adverse change in the significance of an archaeological resources, as defined in Section 15064.5 of the State CEQA Guidelines.	Potentially Significant (construction) No Impact (operation)	MM-CR-8	Less Than Significant (construction)
CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.[3]	Potentially Significant (construction) No Impact (operation)	MM-CR-9	Less Than Significant (construction)
CR-4: Disturb any human remains, including those interred outside of formal cemeteries.[3]	Potentially Significant (construction) No Impact (operation)	MM-CR-10	Less Than Significant (construction)

Source: County of Los Angeles 2014.

Notes:

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3. Threshold of Significance CUL-3 from the 2014 Master Plan is addressed in Chapter 3.6, Geology and Soils, of this Draft SEIR as this threshold is related to paleontological resources.

3.4.4 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

On-Site Historical Resources

The following discussion analyzes potential impacts to the six historical resources, consisting of four individual buildings and two historic districts, located on the Project Site:

- Old Administration Building
- Los Angeles General Hospital–Acute Unit Building
- Los Angeles General Hospital–Acute Unit Historic District
- College of Osteopathic Physicians and Surgeons Historic District
- Tower Hall
- Phinney Hall

Construction

Construction activities associated with implementation of the Proposed Project over a period of 25 years would involve selective demolition and seismic retrofit of the Los Angeles General Hospital–Acute Unit, demolition of several structures on the West Campus (see Table 2-3, *Buildings and Features to Be Demolished*), excavation, trenching, and overall substantial grading throughout the Project Site, and construction of new buildings and features.

As discussed above, the Project Site contains buildings and structures that have been determined eligible for listing in the NRHP and/or CRHR.

Los Angeles General Hospital–Acute Unit Building and Historic District

Construction activities within the Los Angeles General Hospital–Acute Unit Building and Historic District includes:

- Renovation of the Acute Unit Building and other contributing buildings, structures, and site features within the Historic District
- Demolition activities to make way for programmatic changes.
- New construction.

The Proposed Project would retain and rehabilitate the Los Angeles General Hospital–Acute Unit Building and all contributing buildings, structures, and site features within the Historic District as part of its proposed retention and adaptive reuse. While the Proposed Project would

result in the limited demolition of portions of historic materials or features, implementation of the PDFs require that the vast majority of exterior and interior character-defining features would be retained under the Proposed Project, and the historic character of the General Hospital–Acute Unit Building and Historic District would be preserved. Any new construction within the Historic District would be compatible with the size, scale, massing, and design of the Acute Unit Building and district contributors. Thus, implementation of the PDFs requires that all work proposed within the Historic District meets the Standards. As stated, the County is pursuing Federal Historic Preservation Tax Incentives for the Acute Unit's proposed rehabilitation work, which requires rigorous review by the National Park Service (NPS) and California Office of Historic Preservation (OHP) for compliance with the Rehabilitation Standards. State CEQA Guidelines Section 15064.5(b)(3) states that activities that comply with the Standards shall be considered as mitigated to a level of less than a significant impact on the historical resource. Thus, proposed construction within the General Hospital Acute Unit Building and Acute Unit Historic District would be **less than significant**.

Western Portion of the Main Campus

New construction within the rest of the main campus, specifically the portion of the main campus west of State Street, has the potential to impact three adjacent historical resources: the Acute Unit Building, the Acute Unit Historic District, and the Old Administration Building. New construction that is adjacent to historical resources (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions) may impact the historical resources if it is incompatible with the scale, massing, height, or style of the resources, or if it results in diminished integrity of the resources (specifically, setting and/or feeling) due to its impact on historically important views and/or spatial relationships.

Additionally, use of certain types of equipment during future construction activities could generate levels of vibration that have the potential to result in physical impacts to historical resources. See Chapter 3.11, *Noise,* for additional information regarding vibration from certain types of equipment and applicable thresholds. Physical vibration-related impacts resulting from construction equipment could result in damage to historical buildings, such as exterior deterioration, building cracks, or structural damage.

Therefore, impacts related to design incompatibility, diminished integrity, and physical damage due to construction-related vibration is potentially **significant.**

Non-Contiguous Areas

No specific redevelopment projects are currently proposed within the non-contiguous areas of the Project Site that would result in indirect impacts on the following historical resources within the College of Nursing and Allied Health portion of the Project Site: College of Osteopathic Physicians and Surgeons Historic District (Osteopathic College Historic District), Tower Hall, and Phinney Hall.

These resources are located across North Mission Road from, and not directly adjacent to, the potential new construction projects on the main campus. Tower Hall and Phinney Hall face north on Griffin Avenue and are oriented away from the potential new construction sites. Given the orientation of these resources and their location from the main campus, which is where construction would occur, no historically important views of or from Tower Hall or Phinney Hall, or of or from within the Osteopathic College Historic District, would be blocked by new construction associated with the Proposed Project. Additionally, the setting of Tower Hall, Phinney Hall, and the Osteopathic College Historic District has already been compromised through the demolition of institutional buildings to the north and on the main campus to the east, the addition of new buildings in the 1970s, 1980s, and 1990s within the historic district, and the re-grading of Griffin Avenue, which now largely blocks views of Phinney Hall from the public right-of-way. Thus, the potential new construction projects on the main campus, which would remain visually separate and oriented away from these buildings, would not further alter their settings. For these reasons, the Osteopathic College Historic District, Tower Hall, and Phinney Hall would continue to convey each important historic and physical characteristics that make them eligible for designation. These historical resources would retain all aspects of integrity they currently have after the new construction projects associated with the Proposed Project are completed. Therefore, the Proposed Project would not have any indirect impacts on the historic district or these two buildings; impacts would be **less than significant**.

Summary

In summary, construction activities and introduction of new development associated with the Proposed Project would have the potential to impact the following historical resources:

- Old Administration Building
- Los Angeles General Hospital–Acute Unit Building
- Los Angeles General Hospital–Acute Unit Historic District

Potential impacts to historical resources from implementation of the Proposed Project would include the following potential adverse effects:

- Introduction of new buildings under the Proposed Project may be incompatible with adjacent historical resources in terms of scale, massing, height, and/or style, resulting in diminished integrity of setting and feeling.

Construction activities associated with the Proposed Project may result in vibration impacts that could result in physical impacts to adjacent historical resources.

The above-listed impacts on the Old Administration Building, Los Angeles General Hospital–Acute Unit Building, and Los Angeles General Hospital–Acute Unit Historic District, are considered potentially **significant**.

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

Mitigation Program for Adjacent New Construction

If a new construction project is proposed for a site within 50 feet of an eligible or designated historical resource, then the Project Applicant(s) shall apply Mitigation Measure CUL-1a (Secretary Standards Compliance) and engage a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the project is adjacent to the resource (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions). If the new construction is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the new construction is found to be adjacent to the identified resource, the Architectural Historian/Historic Architect shall assess the project, focusing on the application of Standards No. 9 and 10, both of which relate to adjacent new construction.

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

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

Mitigation Measure CUL-1a: Secretary Standards Compliance. For all instances in which a project is implementing activities under the Proposed Project within 50 feet of an eligible or designated historical resource identified in this Draft SEIR, the Project Applicant shall engage the services of a qualified Architectural Historian or Historic Architect meeting the Secretary of the Interior's Professional Qualifications Standards to determine whether the future implementing project activity is adjacent to the identified historical resource (taking into account the scale of the project, any physical or visual separation, and existing baseline conditions). If the future implementing project activity

is determined not to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall prepare a statement to that effect, and no further analysis shall be required. If the future implementing project activity is determined to be adjacent to the identified historical resource, the Architectural Historian/Historic Architect shall conduct an assessment of whether the proposed treatment of the historical resource complies with the Secretary of the Interior's Standards for Rehabilitation ("the Rehabilitation Standards"). If the future implementing project activity is found to not be in compliance with the Rehabilitation Standards, then the Architectural Historian/Historic Architect shall provide recommendations for how to modify the design, siting, scale, massing, or architectural treatment of the future implementing development projects to the extent feasible to bring it into compliance, or as close to compliance as feasible, which shall be integrated into the design of the Proposed Project. The professional shall prepare a memorandum or equivalent level of documentation conveying the findings of the assessment, which shall be provided to the County.

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

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

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

following provisions: (1) shored excavation and adjacent buildings, structures, sidewalks, utilities, facades, and cracks shall be visually inspected at a minimum of one time per month; (2) survey monuments shall be measured at critical stages of excavation, shoring, dewatering, and construction but should not occur less frequently than once every thirty days; (3) monitoring reports shall be prepared by an appropriate technical professional California Professional Land Surveyor documenting the movement monitoring results and distributed to all appropriate parties, including the shoring engineer. The County shall be provided all documentation and be notified if movement exceeds predetermined thresholds and calculated amounts as required.

Significance with Mitigation: Significant and unavoidable. Given designs for future projects are not known at this time, construction impacts are considered to be **significant and unavoidable**.

Operation

Operation of the Proposed Project would involve general activation of the Project Site through new uses, including residential, commercial, office, etc. It would include ongoing operation and maintenance activities associated with general upkeep of the Project Site. These activities would not result in any substantive changes beyond those described for construction activities. The Proposed Project would maintain the historical significance of the Los Angeles General Hospital–Acute Unit Building and historic district through preserving and rehabilitating the character-defining features of these historical resources and integrating adaptive reuse strategies that balance preservation with current safety, accessibility, and sustainability standards. The existing uses and operations of the Old Administration Building, College of Osteopathic Physicians and Surgeons Historic District, Tower Hall, and Phinney Hall would remain unchanged under the Proposed Project, and no physical alteration or redevelopment is proposed. The Proposed Project would be consistent with Policy C/NR 14.3 of the Conservation and Natural Resources Element of the LA County General Plan 2035 in that it would preserve the six identified historic features within the Project Site. Therefore, operational impacts to historical resources are **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Indirect Impacts to Off-Site Historical Resources

As previously identified, there are four identified historical resources or historical resources located within one block of the Project Site.

Construction and Operation

Raulston Medical Research Building and Seely Wintersmith Mudd/McKibben Hall

The Raulston Medical Research Building and Seely Wintersmith Mudd/McKibben Hall are located to the north of and across Zonal Avenue from the Project Site. Because these buildings face Zonal Avenue and San Pablo Street, important views of the historical resources are from the two streets. Future development associated with the Proposed Project would remain visually separate and oriented away from these buildings and would not adversely impact their settings. For these reasons, the Raulston Medical Research Building and Seely Wintersmith Mudd/McKibben Hall would continue to convey all of their important historic and physical characteristics that make them eligible for designation. The buildings would retain all aspects of integrity they currently have after development associated with the Proposed Project is completed. Therefore, impacts would be **less than significant**.

Mixed-Use Commercial Building

The mixed-use commercial building at 1143 Mission Road is located to the west of and across Mission Road from the Project Site. The building faces Mission Road and, thus, important views of the building are from Mission Road. The building's setting has changed significantly since its 1920s construction, including the demolition and redevelopment of the Los Angeles General Hospital main campus to the east of the building and the demolition of commercial buildings to make way for parking lots directly north and south of the building. Thus, the potential new development under the Proposed Project, which would remain visually separate from the building, would not further alter its settings. For these reasons, the historical resource would continue to convey all of its important historic and physical characteristics that make it eligible for designation. The building would retain all aspects of integrity it currently has after development associated with the Proposed Project is completed. Therefore, impacts would be **less than significant**.

Neighborhood Market

The neighborhood market at 1000 Clement Street is located one block south of the Project Site. The commercial building faces Clement Street and, thus, important views of the building are from the street. Further, the building is physically and visually separated from the Project Site by several buildings on Clement Street to the north. Thus, future development associated with the Proposed Project would not block any views of or change any of the development currently surrounding the building. Thus, future development associated with the Proposed Project would not alter the current setting of the historical resource. For these reasons, the historical resource would continue to convey all of its important historic and physical characteristics that make it eligible for designation. The building would retain all aspects of integrity it currently has after development associated with the Proposed Project is completed. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Construction

Construction of facilities and improvements proposed under the Proposed Project would occur over a period of 25 years as funding for each individual project is appropriated. Although the Project Site is located within an urbanized area and has previously undergone disturbance through long-term development and activity on the Project Site, there is a potential for previously undiscovered archaeological resources to be present beneath the Project Site.

Los Angeles General Hospital–Acute Unit Historic District

Construction within the Los Angeles General Hospital–Acute Unit Historic District would involve redevelopment and site improvements in areas with previously disturbed soils. While much of the area has been altered by prior development, ground-disturbing activities could encounter previously unidentified archaeological resources. Potential impacts could include disturbance or destruction of subsurface archaeological deposits. Disturbance or destruction of archaeological resources resulting in a substantial adverse change in the significance of the resource would result in a potentially **significant** impact.

Western Portion of Main Campus

The western portion of the main campus is largely developed; however, as previously discussed, intact alluvial deposits were observed in portions of the Project Site. Construction activities in these portions could encounter buried archaeological resources. Potential impacts could include disturbance or destruction of subsurface archaeological deposits. Disturbance or destruction of archaeological resources resulting in a substantial adverse change in the significance of the resource would result in a potentially **significant** impact.

Non-Contiguous Areas

The non-contiguous areas of the main campus are largely developed or disturbed; however, as previously discussed, intact alluvial deposits were observed in portions of the Project Site. Although there no specific redevelopment projects currently planned within the non-contiguous areas, these areas have the potential to contain archaeological resources. If ground disturbing activities occur in the non-contiguous areas and undiscovered archaeological resources are disturbed in a manner that would result in a substantial adverse change in the significance of the archaeological resource, a potentially **significant** impact would occur.

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

Mitigation Measure CUL-2: Prior to any demolition, grading, or excavation related to the construction of facilities or improvements under the Proposed Project, a qualified archaeologist shall be retained by the Project Applicant(s) to determine which areas shall require cultural resources monitoring during initial ground disturbance. The location of construction activities that are likely to encounter subsurface sediments with archaeological sensitivity shall be determined by the qualified archaeologist upon review of project excavation and grading plans.

If determined necessary by the qualified archaeologist, monitoring by a qualified archaeologist shall be conducted during all initial ground disturbing activities (e.g. grading, removal of foundations, utility trenching, installation of shoring/piles, etc.) within the Project Site, from ground surface level to bedrock.

If, during cultural resources monitoring, the archaeologist determines that the sediments being excavated have been previously disturbed and are unlikely to contain significant cultural materials, the archaeologist shall request that monitoring be reduced or eliminated. Spot-check monitoring shall occur during all construction, on a schedule determined by the project archaeologist.

If buried cultural resources such as trash deposits, building foundations, privy pits, flaked or ground stone, or human remains are inadvertently discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find and the area shall be secured to prevent disturbance. The County will be notified immediately. A qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards shall be retained to evaluate the significance of the find and recommend appropriate treatment measures.

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

If human remains are encountered, work shall halt in accordance with California Health and Safety Code Section 7050.5 and the County of Los Angeles Medical Examiner

(Medical Examiner) shall be notified immediately. If the Medical Examiner determines that the remains are Native American, the Medical Examiner shall notify the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall designate a Most Likely Descendant (MLD). The MLD shall be provided the opportunity to make recommendations regarding the treatment and disposition of the remains in accordance with Public Resources Code Section 5097.98.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure CUL-2, which requires the retention of a qualified archaeologist to determine which areas of the Project Site would require monitoring during ground disturbance and conduct monitoring within such areas. Compliance with this measure would reduce the potential for construction activities associated with the Proposed Project to result in a substantial change in the significance of archaeological resources to **less than significant** levels.

Operation

Operational activities associated with the Proposed Project—such as landscaping, maintenance, utility work, or future minor repair and improvement activities—would generally involve minimal ground disturbance beyond what occurs during initial construction. As a result, the potential for operational activities to encounter previously unidentified archaeological resources is low. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Construction

Ground-disturbing activities have the potential to unearth human remains. Should human remains be uncovered during construction, those remains would require proper treatment in accordance with applicable laws, including Health and Safety Code Sections 7050.5-7055 and Public Resources Code Section 5097.98. These regulations require that there be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. These regulations require the Medical Examiner to make a determination as to whether an investigation into the cause of death is required. If the Medical Examiner has reason to believe the remains are Native American, they must contact the NAHC by telephone within 24 hours. The NAHC will identify the most likely descendant, who can make recommendations for proper treatment and burial, which would be implemented in accordance with Section 15064.5(e) of the State CEQA Guidelines. Compliance with State CEQA Guidelines Section 15064.5(e), California Health and Safety Code Section 7050.05 and Public Resources Code Section 5097.98 would ensure that the Proposed Project's potential disturbance of human remains is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Proposed Project includes a mix of residential, general and medical office, commercial/retail, hospitality, community benefit, educational, warehouse, clean tech/light industrial, hospital, parking, open space, and supporting infrastructure uses. Operational activities associated with these uses, such as landscaping, maintenance, utility work, or future minor redevelopment would generally involve minimal ground disturbance beyond what occurs during initial construction. As a result, the potential for operational activities to encounter previously unidentified archaeological resources is low. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.4.5 Cumulative Impact Analysis

The study area for potential cumulative impacts on cultural resources consists of the Project Site and the immediate surrounding area that encompasses the cumulative projects, which consists of the neighborhoods of Boyle Heights, Lincoln Heights, and Chinatown. This study area was selected because it encompasses the surrounding neighborhoods with the most similar cultural setting to the Project Site. This cumulative study area is similar to the study area identified in the 2014 Master Plan EIR, which identified the Campus and immediate surrounding neighborhoods. The full list of 13 cumulative projects applicable to the Proposed Project's cumulative analyses is provided in Chapter 3, *Environmental Setting*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

As discussed in Chapter 3, there are 11 cumulative projects within approximately one mile of the Project Site, which include 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13).

The 2014 Master Plan EIR determined that the 2014 Master Plan project would result in cumulatively considerable impacts on historical resources due to the demolition of the Women's and Children's Hospital. Additionally, 2014 Master Plan EIR determined that the 2014 Master Plan project would not result in cumulatively considerable impacts on archaeological resources and paleontological resources with the implementation of mitigation.

Would the project have a cumulative effect related to cultural resources?

Historical Resources

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively resulted in substantial adverse changes to historical resources in the region.

Similar to the Proposed Project, related developments in the study area, specifically Cumulative Project 3, would be located in areas that have been previously disturbed. Similar to the Proposed Project, implementation of the Cumulative Project 3 may involve redevelopment, adaptive reuse, or demolition of buildings that are eligible for or listed in the California Register of Historical Resources or local registers. While project-level review and mitigation measures would be required for individual future projects, full avoidance of impacts to historical resources cannot be guaranteed at this programmatic stage. Accordingly, because the Proposed Project's contribution to cumulative impacts on historical resources would combine with impacts from other plans and development activity in the area, and because residual impacts may remain after mitigation, cumulative impacts to historical resources are considered **significant and unavoidable**.

Impact CUL-3: **The Proposed Project's construction activities have the potential to result in cumulative impacts on historical resources.**

Mitigation: Implement Mitigation Measures CUL-1a through CUL-1c.

Significance with Mitigation: Significant and unavoidable. Mitigation Measures CUL-1a through CUL-1c and PDFs listed above, implemented in various combinations and tailored on a case-by-case basis to address specific impacts, may reduce the Proposed Project's contributions to cumulative construction impacts to less than significant levels. However, given designs for future projects implementing the Proposed Project are not known at this time, cumulative construction impacts are considered to be **significant and unavoidable**.

Archaeological Resources

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively resulted in substantial adverse changes to archaeological resources in the region.

Similar to the Proposed Project, related developments in the study area would be located in areas that have been previously disturbed. Because cumulative projects could result in changes to archeological resources, cumulative impacts on archaeological resources are considered potentially significant. The potential for an individual project to affect significant cultural resources, including archaeological resources, is unknown; however, development projects

typically involve ground-disturbing activities, such as excavation, grading, trenching, and foundation construction that could disturb or destroy previously undiscovered archaeological resources. Given the number of projects in the Boyle Heights/Lincoln Heights area of Los Angeles, it is probable that cumulative growth and development could have impacts on significant prehistoric or historical archaeological resources. The Proposed Project's construction activities has the potential to contribute to a cumulative impact related to archaeological resources. Therefore, impacts are potentially **significant**.

Impact CUL-4: The Proposed Project's construction activities have the potential to result in cumulative impacts on archaeological resources.

Mitigation: Implement Mitigation Measure CUL-2.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure CUL-2 would reduce potential Proposed Project-related impacts to less-than-significant levels. Adherence to Mitigation Measure CUL-2, would ensure that the Proposed Project would not contribute to a potential significant adverse cumulative impact on archaeological resources. Therefore, impacts would be **less than significant**.

Human Remains

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable project, collectively resulted in substantial disturbance of human remains. Cumulative level, past, present, and reasonably foreseeable projects in the area could collectively increase the potential for inadvertent discoveries due to the amount of ongoing ground disturbance associated with development in the study area. However, all projects in the State are subject to mandatory requirements under Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, which establish uniform procedures for halting work, protecting the discovery, notifying the Medical Examiner, and consulting with the Native American Heritage Commission and Most Likely Descendant if indigenous remains are identified. Compliance with these requirements ensure consistent treatment and prevents cumulative degradation of human remains. With compliance with mandatory requirements, the Proposed Project's potential impacts would be less than significant; the Proposed Project would not make a cumulatively considerable contribution to cumulative impacts on human remains. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.4.6 Comparison to the 2014 Master Plan EIR Impact Analysis

Development that was analyzed in the 2014 Master Plan EIR and this Draft SEIR would result in potentially significant impacts on historical resources, archaeological resources, and human

remains. As described in Section 3.4.4, *Project Impact Analysis*, and 3.4.5, *Cumulative Impact Analysis*, the Proposed Project would result in potentially significant impacts on historic and archaeological resources that would be reduced through implementation of Mitigation Measures CUL-1a through CUL-1c and Mitigation Measures CUL-2, though impacts would remain significant and unavoidable. This Draft SEIR also includes PDFs to address specific implementing projects of the Proposed Project within the Los Angeles General Hospital–Acute Unit Historic District and related to the Los Angeles General Hospital–Acute Unit Building. The Proposed Project would result in less-than-significant impacts on human remains.

As shown in Table 3.4-7, *Summary of the 2014 Master Plan EIR Cultural Resources Impact Conclusions*, the 2014 Master Plan EIR determined that the 2014 Master Plan would result in significant and unavoidable impacts related to historical resources and less than significant impacts with mitigation related to archaeological resources and human remains. Specifically, the 2014 Master Plan EIR identified that significant and unavoidable impacts would occur with the demolition of the structures associated with the Women's and Children's Hospital; these structures were demolished in 2021 and the former Women's and Children's Hospital site is under construction with structures for Phase IV of the RCV. In this Draft SEIR, the Mitigation Measures from the 2014 Master Plan EIR have been reevaluated based on the Proposed Project, updated information, and changes to existing conditions. It should be noted that 2014 Master Plan EIR mitigation measure MM CR-2, MM-CR-6, and MM-CR-7 have been completed and, thus, no longer apply. The 2014 Master Plan mitigation measures MM-CR-1, MM-CR-4, and MM-CR-5, have been adapted and expanded to more comprehensively address identified historical resources on the Project Site. Specifically, 2014 Master Plan EIR mitigation measure MM-CR-1 was adapted/expanded as PDF 3 and MM-CR-5 was adapted/expanded as PDFs 1 and 2. These PDFs were included to address specific projects related to the Los Angeles General Hospital–Acute Unit Historic District and Los Angeles General Hospital–Acute Unit Building. PDFs 1-3 are intended to facilitate the required ongoing project compliance with the Secretary of the Interior's Standards, thereby ensuring there are no impacts to these historical resources through implementation of the Proposed Project. MM-CR-4 was adapted/expanded as Mitigation Measures CUL-1b and CUL-1c. Whereas MM-CR-4 required a historic structures assessment, protection/preservation plan, and construction monitoring for the Old Administration Building and Pharmacy Building, Mitigation Measures CUL-1b and CUL-1c are more comprehensive in that they require conditions assessments and construction monitoring for any historical resource adjacent to proposed new construction.

The 2014 Master Plan EIR did not include a comprehensive, intensive-level historical resources evaluation of all age-eligible buildings on the Project Site. Rather, previous historic eligibility findings were carried over from the 1999 LAC+USC Medical Center Replacement Project EA/EIR. In preparation of this Draft SEIR, ARG evaluated all buildings 45 years of age or older on the Project Site for individual eligibility. Through its evaluation, ARG concluded that the Pharmacy Building and Viaduct, which had previously been identified as contributors to a potential "Support Services Site" historic district, are no longer eligible as district contributors because

the "Support Services Site" was largely demolished in the late 1990s and 2000s and no longer retains sufficient integrity to convey its significance as a historic district. Furthermore, ARG concluded that the Pharmacy Building and Viaduct are not individually eligible for listing under any federal, state, or local registration criteria. Thus, the Pharmacy Building and Viaduct are not historical resources under CEQA, and their proposed demolition under the Proposed Project would not result in significant and unavoidable impacts to historical resources. For these reasons, the 2014 Master Plan EIR mitigation measure MM-CR-3, which pertained to the preparation of protection plans for the Pharmacy Building and Viaduct, is no longer applicable. Rather, the Draft SEIR PDFs 4 and 5 are intended to document the Pharmacy Building, Viaduct, and the "Support Services Site" and their associations with the history and development of Los Angeles County General Hospital.

MM-CR-8 from the 2014 Master Plan EIR has been retained and is identified as Mitigation Measure CUL-2 in this chapter of the Draft SEIR. MM-CR-10 has been removed as this measure does not constitute CEQA mitigation because it restates existing legal requirements under the Healthy and Safety Code and Public Resources Code. CEQA does not permit compliance with existing law to be used as a mitigation measure. The mitigation measures for cultural resources in the 2014 Master Plan EIR have been revised for clarity and to include updated regulatory timing and language. Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

3.4.7 References

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3.5 ENERGY

This chapter of the Draft SEIR discusses potential impacts related to energy that could result from future development and implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. This analysis is guided by the State CEQA Guidelines and the energy conservation goals illustrated in State CEQA Guidelines Appendix F.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025 to November 21, 2025, no comments were received regarding energy impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are summarized in Table 1-1, *Summary of Scoping Comments Received*.

Terminology

The following are definitions for key terms used throughout this section.

- **BTU:** British thermal unit; a standard unit of measurement that is used to represent the energy content of heating fuels (e.g., natural gas, propane) and is equal to the amount of heat needed to raise the temperature of one pound of water by one degree Fahrenheit.
- **CAISO:** California Independent System Operator; a non-profit public benefit corporation regulated by the Federal Energy Regulatory Commission that operates the high-voltage electric grid and wholesale power markets in California.
- **CALGreen:** California Green Building Code (California Code of Regulations [CCR}, Title 24, Part 11); encompasses only Part 11 of the California Building Standards Code (CBSC), which stipulates water, waste, and design efficiencies as well as electric vehicle charging standards.
- **CBSC:** California Building Standards Code; includes all individual parts to CCR, Title 24.
- **CEC:** California Energy Commission; a State agency within the California Natural Resources Agency that sets energy policy and building energy efficiency standards, develops the State's energy growth demand projections, engages in long-term power generation resource planning, and approves power plant siting.
- **CPUC:** California Public Utilities Commission; an independent State regulatory commission that oversees investor-owned utilities (e.g., electric, gas, water, telecommunications) by setting rates and procurement requirements in alignment with CEC energy policy and CAISO grid operations.
- **Energy Code:** California Building Energy Efficiency Standards (CCR, Title 24, Part 6); encompasses only Part 6 of the CBSC, which stipulates energy-efficiency standards for new projects.

- **kWh:** Kilowatt-hour; a standard unit of measurement that is used to represent the amount of electricity consumed or supplied and is equivalent to approximately 3,412 British thermal units.
- **MWh:** Megawatt-hour; one MWh is equal to 1,000 kWh.
- **GWh:** Gigawatt-hour; one GWh is equal to 1,000 MWh or 1,000,000 kWh.
- **VMT:** Vehicle miles traveled.

3.5.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

Energy Policy and Conservation Act of 1975 and Corporate Average Fuel Economy Standards

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE Standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the

EPA finalized updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. On December 21, 2021, under direction of Executive Order 13990 issued by President Biden, the National Highway Traffic Safety Administration (NHTSA) repealed the SAFE Vehicles Rule Part One, which had preempted State and local laws related to fuel economy standards. In addition, on March 31, 2022, the NHTSA finalized new fuel standards that increase fuel efficiency eight percent annually for model years 2024 to 2025 and 10 percent for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which will be a 10 mpg increase compared to model year 2021 (NHTSA 2022).

On June 7, 2024, NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The final rules establish standards that would require an industry fleetwide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027–2031) and for light trucks (model years 2029–2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030–2032) and 8 percent per year (model years 2033–2035) (NHTSA 2024).

In June 2025, NHTSA published a final rule, “Resetting the Corporate Average Fuel Economy Program.” The rule identifies factors statutorily prohibited from consideration when setting maximum feasible fuel economy standards under the Energy Policy and Conservation Act of 1975, the Energy Independence and Security Act of 2007, and other applicable laws. It also describes NHTSA’s authority to bring the CAFE program into compliance with relevant statutory requirements, in accordance with the President Trump’s “Unleashing American Energy” Executive Order and the Secretary’s “Fixing the CAFE Program” Memorandum. The rule also describes NHTSA’s interpretation of its authority for a commercial medium- and heavy-duty on-highway vehicles and work trucks fuel efficiency improvement program, to establish the necessary legal foundation to bring that program into compliance with law. This rule does not itself change existing CAFE or medium- and heavy-duty standards. During the rulemaking process for replacement standards, NHTSA will exercise its enforcement authority regarding all existing CAFE and medium- and heavy-duty standards in accordance with the interpretation set forth in this rulemaking (NHTSA 2025).

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for

the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment. The National Energy Policy provided a strategic blueprint to reduce dependence on foreign energy imports and diversify domestic energy supply but did not include legislative implementation.

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act built on the National Energy Policy of 2001 as its legislative implementation and includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) was adopted to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The act sets increased corporate average fuel economy standards; the renewable fuel standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2025).

STATE

Warren-Alquist Act

Established in 1974, the Warren-Alquist Act created the California Energy Commission (CEC) in response to the energy crisis of the early 1970s and the state's unsustainable growing demand for energy resources. The CEC's core responsibilities include advancing State energy policy, encouraging energy efficiency, certifying thermal power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The Warren-Alquist Act is updated periodically through legislative bills to address current energy needs and issues.

California Long-Term Energy Efficiency Strategic Plan

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision and goals for each economic

sector, identifying specific near-term, midterm, and long-term strategies to assist in achieving these goals. This plan sets the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.[1]
- All new commercial construction in California will be zero net energy by 2030.
- Heating, ventilation and air conditioning, commonly referred to as "HVAC," will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space accounts for 38 percent of the State's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, and space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility types for electricity and gas consumption, accounting for approximately 10 percent of State's electricity and gas use (CPUC 2011).

The CPUC and the CEC have adopted the following goals to achieve zero net energy levels by 2030 in the commercial sector:

- **Goal 1:** New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.
- **Goal 2:** 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.
- **Goal 3:** Transform the commercial lighting market through technological advancement and innovative utility initiatives.

California Energy Action Plan

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the state of California's principal energy planning and policy document. The 2008 Update is the latest update and continues the original Energy Action Plan (adopted in 2003). It describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically

[1] Zero net energy buildings are buildings where the total amount of energy used by the building on an annual basis is equal to or less than the amount of renewable energy created on the site.

advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

Renewables Portfolio Standard Program

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006, 2011, and 2018. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order (EO) S 14 08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the California legislature in 2011 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state.

Clean Energy and Pollution Reduction Act

The Clean Energy and Pollution Reduction Act, commonly known by its legislative bill number SB 350 was enacted on October 7, 2015, which expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year be renewable energy by December 31, 2030. In addition, this Act includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. This Act also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. This Act also provides for the transformation of the California Independent System Operator (CAISO) into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by CAISO to those markets, pursuant to a specified process.

Senate Bill 100

On September 10, 2018, SB 100 was signed into law to replace the Clean Energy and Pollution Reduction Act (SB 350) requirements. Under SB 100, the RPS for public owned facilities and

retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill also establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The Clean Energy, Jobs, and Affordability Act Of 2022

The Clean Energy, Jobs, and Affordability Act Of 2022, commonly known as legislative bill number SB 1020, was signed into law on September 16, 2022. This Act requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, this Act requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

Energy Storage

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The California Independent System Operator (CAISO) has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems, such as batteries, pumped hydroelectric storage, and thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load serving entities (LSEs) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

The Integrated Resource Plan

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders, and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical

role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual Battery Energy Storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the State's electricity grid.

The Interconnection Queue

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the Interconnection Queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid, and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

Energy Related Regulations

Table 3.5-1, *State Energy Efficiency Regulations*, provides a summary list of energy efficiency regulations in California that apply to individual development projects.

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
Title 20 Appliance Energy Efficiency	California's Appliance Efficiency Regulations contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California (California Code of Regulations [CCR] Title 20, Parts 1600–1608). These standards are updated regularly to allow consideration of new energy efficiency technologies and methods (CEC 2017).
Title 24, Part 6, Building Energy Efficiency Standards	Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2022 (CCR Title 24, Part 6). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission in December 2021. The 2022 standards became effective and replaced the 2019 standards on January 1, 2023. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards also include prescriptive photovoltaic (PV) system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021). The CEC adopted the final code language for the 2025 Energy Code on September 11, 2024. The 2025 Energy Code became effective on January 1, 2026.
Title 24, Part 11, Green Building Standards	On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. It includes mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
	mandatory provisions of CALGreen became effective January 1, 2011, and were last updated in 2022. The 2022 CALGreen update, which was approved as part of 2022 Energy Code became effective on January 1, 2023, and provides updates to the residential and non-residential voluntary measures. Overall, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. CALGreen contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency (24 CCR Part 11). The CEC adopted the final code language for the 2025 CALGreen standards on September 11, 2024. The 2025 CALGreen standards became effective on January 1, 2026.
Assembly Bill 1493 (Pavley Law)	California vehicle GHG emission standards were enacted under Assembly Bill (AB) 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the USEPA. In 2012, the USEPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the CAFE standards under *Federal*, above). In January 2012, the California Air Resources Board (CARB) approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will have emitted 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions (CARB 2017).

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
Title 13, Chapter 9, Article 4.8, Section 2449	Section 2449 of the CCR, Title 13, Chapter 9, Article 4.8 was adopted on May 2, 2008, that limits non-essential idling of fleets to no more than five consecutive minutes at any location. This idling restriction applies to all vehicles in California with a diesel-fueled or alternative diesel-fueled off-road engine, unless a waiver provides sufficient justification that such idling is necessary.
Advanced Clean Cars II	On September 23, 2020, EO N-79-20 was issued, which sets a time frame for the transition to zero-emission (ZE) passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop and propose the following: ▪ Passenger vehicle and truck regulations requiring increasing volumes of new zero-emission vehicles (ZEVs) sold in California toward the target of 100 percent of in-state sales by 2035. ▪ Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035. ▪ Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the USEPA, and local air districts. On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codify the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, Advanced Clean Cars II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids. However, on May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for the ACC II program through congressional resolution House Joint (H.J.) Resolution 88. On June 12, 2025, President Trump signed the resolution, which formally nullified ACC II. Currently, implementation of ACC II is unknown.
Advanced Clean Fleets	In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles. In conjunction with the Advanced Clean Trucks regulation, the ACF regulations helps to ensure that medium- and heavy-duty ZEVs are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach which provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public infrastructure network.

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
	The ACF regulations covers four main elements: ▪ **Manufacturer sales mandate.** Manufacturers may sell only zero-emission medium- and heavy-duty vehicles starting in 2036. ▪ **Drayage fleets.**[2] Beginning January 1, 2024, trucks must be registered in the CARB Online System to conduct drayage activities in California. Non-zero-emission "legacy" drayage trucks may register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035. ▪ **High priority and federal fleets.** High priority and federal fleets must comply with the Model Year Schedule or may elect to use the optional ZEV Milestones Option to phase-in ZEVs into their fleets: o Model Year Schedule: Fleets must purchase only ZEVs beginning 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life as specified in the regulation. o ZEV Milestones Option (Optional): Instead of the Model Year Schedule, fleets may elect to meet ZEV targets as a percentage of the total fleet starting with vehicle types that are most suitable for electrification. ▪ **State and local agencies.** State and local government fleets, including city, county, special district, and State agency fleets, would be required to ensure 50 percent of vehicle purchases are zero-emission beginning in 2024 and 100 percent of vehicle purchases are zero-emission by 2027. Small government fleets (those with 10 or fewer vehicles) and those in designated counties would start their ZEV purchases beginning in 2027. Alternately, State and local government fleet owners may elect to meet ZEV targets using the ZEV Milestones Option. State and local government fleets may purchase either ZEVs or near-ZEVs, or a combination of ZEVs and near-ZEVs, until 2035. Starting in 2035, only ZEVs will meet the requirements.

[2] Drayage trucks are in-use class 7 and 8 on-road vehicles that transport containers and bulk goods to and from seaports and intermodal railyards. Land ports of entry, which provide controlled entry to or departure from the United States, are not considered seaports or intermodal railyards.

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
	The ACF regulations would also establish requirements that transform the medium- and heavy-duty vehicle sector and demonstrate independent utility through achievement of the following objectives: ▪ Achieve criteria and GHG emissions reductions consistent with the goals identified in the State Implementation Plan Strategy and Scoping Plan. ▪ Provide emissions reductions in disadvantaged communities, thereby supporting the implementation of AB 617 (Garcia, C., Chapter 136, Statutes of 2017). ▪ Support the goals of EO N-79-20 which calls for accelerated ZEV deployment with these targets: o 100 percent ZE drayage by 2035 o 100 percent ZE trucks and buses where feasible by 2045 ▪ Ensure requirements, such as ZEV deployment schedules and related infrastructure build-out, are technologically feasible, cost-effective, and support market conditions. ▪ Lead the transition away from petroleum fuels and towards electric drivetrains. ▪ Contribute towards achieving carbon neutrality in California pursuant to SB 100, and in accordance with EO B-55-18. ▪ Mindfully set requirements to allow time for public ZE infrastructure buildout for smaller fleets or for regional haul applications who would be reliant on a regional network of public chargers. ▪ Ensure manufacturers and fleets work together to place ZEVs in service suitably and successfully as market expands. ▪ Establish a fair and level playing field among fleet owners. ▪ Craft the Proposed Project in a way that ensures institutional capacity for CARB to manage, implement, and enforce requirements. On January 13, 2025, CARB withdrew their requests for the federal CAA waiver from the USEPA needed to support the ACF regulation. In addition, on September 25, 2025, CARB repealed the ACF drayage truck requirements (13 CCR § 2014) and the high priority and federal fleet requirements (13 CCR § 2015 through 2015.6). California currently has no authority to implement ACF.
Small Off-Road Engine Regulations	Small Off-Road Engines (SORE) Regulation applies to spark-ignition engines rated at or below 19 kilowatts (25 horsepower), including lawn and garden, industrial, logging, airport ground support, and commercial utility equipment, gold carts, and specialty vehicles. CARB's SORE Regulation, last amended in December 2021, establishes new emission

Table 3.5-1 State Energy Efficiency Regulations

Regulation	Summary
	standards starting with the 2024 model year of zero grams of exhaust and evaporative emissions per kilowatt-hour, effectively requiring zero-emission or electric engines for those subject to the SORE Regulation.

REGIONAL

Southern California Association of Governments' 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the Southern California Association of Governments (SCAG) region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCS'' to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

LOCAL

County of Los Angeles General Plan

The Conservation and Natural Resources Element of the County of Los Angeles General Plan was updated in 2025 (County of Los Angeles 2025a). The Conservation and Natural Resources Element guides the long-term conservation of natural resources including energy and includes policies to aid in the conservation and preservation of natural resources. Applicable policies from the Conservation and Natural Resources Element include:

- **Policy C/NR 12.1.** Encourage the production and use of renewable energy resources.
- **Policy C/NR 12.2.** Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.

- **Policy C/NR 12.3.** Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

County of Los Angeles Climate Action Plan

The County of Los Angeles adopted its 2045 Climate Action Plan (CAP) on June 25, 2024 and serves as an implementation program of the County's General Plan Air Quality Element.[3] The 2045 CAP is a comprehensive and actionable plan for implementing the GHG emissions reduction policies of the Air Quality Element and for reducing GHG emissions in the unincorporated areas of the County. Overall, the 2045 CAP includes 10 strategies, 25 measures, and 94 actions across all GHG emissions-producing sectors (County of Los Angeles 2025b). The 2045 CAP Strategies directly related to energy include the following:

- **Strategy 1:** Decarbonize the Energy Supply.
- **Strategy 5:** Decarbonize Buildings
- **Strategy 6:** Improve Efficiency of Existing Building Energy Use

City of Los Angeles General Plan

The Infrastructure Systems Element of the City of Los Angeles General Plan was adopted in 1972 (City of Los Angeles 1972). The Infrastructure Systems Element guides the long-term planning of power infrastructure resources and includes a Power System Plan that contains objectives to aid in identifying future construction of the power facilities of the City's Department of Power and Water. Applicable objectives from the Power Systems Plan include:

- To facilitate the utilization of advancements in technology, as they become practicable for application, to meet the ever-increasing demand for the most reliable power supply possible at the most economical rates.
- To facilitate the periodic re-evaluation of the Los Angeles City Power System to reflect changing requirements for the generation and distribution of power as necessary to adjust it to changes in the land use and development patterns of the City.
- To provide a basis for the linking of the Power System with power systems of other utilities, so as to diversity sources of power and optimize reliability of service on a reciprocal basis.
- To encourage and facilitate the systematic replacement of overhead distribution power lines with underground circuits.
- To set forth general power system design standards relating to power supply and to external appearance of facilities.

[3] The 2045 CAP replaced the previous 2020 County Climate Action Plan, which was adopted as a component of the General Plan Air Quality Element and served as the prior implementation program.

3.5.2 Existing Conditions

ELECTRICITY

The Project Site is in Los Angeles Department of Power and Water (LADWP) service area, which spans the City of Los Angeles and Owens Valley (CEC 2023). Total electricity consumption in LADWP's service area was approximately 23,436 gigawatt-hours (GWh) in 2024 (CEC 2025a). As shown in Table 3.5-2, *County of Los Angeles 2024 Electricity Demand*, electricity consumption in Los Angeles County was approximately 64,896 GWh in 2024, which exceeds the LADWP service area's 2024 electricity consumption because the county extends well beyond LADWP's service area boundaries (CEC 2025a). Therefore, as shown in Table 3.5-2, the County of Los Angeles experienced a per capita electricity consumption rate of approximately 6,589 kilowatt-hours (kWh) per person per year in 2024. It should be noted that County energy consumption rates were retrieved to characterize existing per capita energy consumption because that is the smallest scale at which energy consumption estimates are publicly available.

Table 3.5-2 County of Los Angeles 2024 Electricity Demand

Sector	Electricity Usage (kWh per year)
Residential	21,554,000,000
Nonresidential	43,342,000,000
Total	**64,896,000,000**
2024 County Population	9,848,643
County Per Capita Electricity Demand	**6,589**

Source: CEC 2025a.

Notes: kWh = kilowatt hour

Sources of electricity sold by LADWP in 2023 were (CEC 2024):

- 39.5 percent eligible renewable resources:
  - 0.1 percent biomass and biowaste
  - 9.5 percent geothermal
  - 2.4 percent small hydroelectric
  - 14.0 percent solar
  - 13.5 percent wind
- 17.8 percent eligible carbon-free resources:
  - 3.9 percent large hydroelectric
  - 13.9 percent nuclear
- 42.7 percent non-RPS eligible resources:
  - 10.3 percent coal

- 32.4 percent natural gas
- 0 percent other
- 0 percent unspecified power (i.e., not traceable to specific sources)

NATURAL GAS

The Southern California Gas Company (SoCalGas) provides natural gas to the City and County of Los Angeles. SoCalGas' service area spans much of the southern half of California, from Imperial County on the southeast to San Luis Obispo County on the northwest, to part of Fresno County on the north, to Riverside County and most of San Bernardino County on the east (CEC 2022). Total natural gas consumption in SoCalGas's service area was approximately 4,459 million Therms in 2024 (CEC 2025b). As shown in Table 3.5-3, *County of Los Angeles 2024 Natural Gas Demand*, natural gas consumption in Los Angeles County was approximately 2,830 million Therms in 2024 (CEC 2025b). Therefore, as shown in Table 3.5-3, the County of Los Angeles experienced a per capita natural gas consumption rate of approximately 287 Therms per person per year in 2024, which is equal to approximately 28.7 million British thermal units (MMBTU) per person per year. It should be noted that county energy consumption rates were retrieved to characterize existing per capita energy consumption because that is the smallest scale at which energy consumption estimates are publicly available.

Table 3.5-3 County of Los Angeles 2024 Natural Gas Demand

Sector	Natural Gas Usage (Therms per year)
Residential	1,081,300,000
Nonresidential	1,748,700,000
Total	**2,830,000,000**
2024 County Population	9,848,643
County Per Capita Natural Gas Demand	**287**

Source: CEC 2025b.

TRANSPORTATION FUELS

California contains a network of crude oil pipelines that connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay Area, and the Central Valley. California oil refineries also process Alaskan and foreign crude oil received in ports in Los Angeles, Long Beach, and the San Francisco Bay Area. Crude oil production in California and Alaska is in decline, and California refineries have become increasingly dependent on foreign imports (CEC 2025c). Foreign supplies—led by Iraq, Brazil, and Guyana in 2024— provide over half of the crude oil refined in California (CEC 2025d). According to the United States Energy Information Administration (EIA), California's field production of crude oil has steadily declined since the mid-1980s with a total production of approximately 110 million barrels in 2024 (EIA 2025). In

Los Angeles County, including all incorporated cities therein, approximately 2,987 million gallons of gasoline and 458 million gallons of diesel fuel were sold in 2024 (CEC 2025e).

As shown in Table 3.5-4, *County of Los Angeles 2024 Transportation Fuel Demand*, the County of Los Angeles experienced a per capita fuel consumption rate of approximately 350 gallons of fuel per person per year in 2024. It should be noted that County energy consumption rates were retrieved to characterize existing per capita energy consumption because that is the smallest scale at which energy consumption estimates are publicly available.

Table 3.5-4 County of Los Angeles 2024 Transportation Fuel Demand

Resource	Fuel Usage (gallons per year)
Gasoline	2,987,000,000
Diesel	457,870,000
Total	**3,444,870,000**
2024 County Population	9,848,643
County Per Capita Transportation Fuel Demand	**350**

Source: CEC 2025e.

EXISTING ENERGY DEMANDS

The existing land uses within the Project Site consist primarily of medical and clinical uses and ancillary supporting facilities. These operations currently result in energy demands from building heating and cooling and building process loads (i.e., equipment other than HVAC equipment). Table 3.5-5, *Building Energy Consumption: Existing Uses*, shows the electricity and natural gas demands of the buildings associated with existing uses within the Project Site.

Table 3.5-5 Building Energy Consumption: Existing Uses

Land Use	Electricity Usage (kWh per Year)	Natural Gas Usage (MMBTU per Year)
Educational	40,118	120
Hospital	95,774,332	115,568
Housing/Office	2,452,550	3,094
Parking Structure	4,600,476	0
Storage/Warehouse/Utilities	506,785	1,716
Total	**103,374,261**	**120,497**

Source: CalEEMod v2022.1.

Notes: kWh = kilowatt hour; MMBTU = million British thermal units.

In addition to building energy demands, the existing uses within the Project Site generate vehicle trips that result in transportation fuel demands as shown in Table 3.5-6, *Annual Transportation Energy Usage: Existing Uses*.

Table 3.5-6 Annual Transportation Energy Usage: Existing Uses

Resource	Fuel Usage (gallons or kWh per year)
Gasoline	6,607,256
Diesel	479,868
CNG	19,229
Electricity	3,346,290

Source: Appendix C.

Notes: CNG = compressed natural gas; kWh = kilowatt hour.

3.5.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section VI, states that the Proposed Project would result in a significant impact related to energy if it would:

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

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

At the time the 2014 Master Plan EIR was certified, the topic of energy was not a distinct environmental topic in Appendix G of the State CEQA Guidelines (became effective January 1, 2019). Although the significance criteria identified above represent new thresholds of significance, impacts related to energy do not represent a new environmental impact. Impacts related to energy were addressed in Section 3.15, *Utilities/Service Systems* of the 2014 Master Plan EIR.

STATE CEQA GUIDELINES APPENDIX F GUIDANCE

The State CEQA Guidelines Appendix F, Energy Conservation, identifies that EIRs should include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources, as applicable. Environmental effects to be considered may include the Proposed Project's energy requirements and its energy use efficiencies by amount and fuel type during demolition,

construction, and operation; the effects of the Proposed Project on local and regional energy supplies; the effects of the Proposed Project on peak and base period demands for electricity and other forms of energy; the degree to which the Proposed Project complies with existing energy standards; the effects of the Proposed Project on energy resources; and the Proposed Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

To assist in analyzing whether the Proposed Project's energy consumption is considered wasteful, inefficient, or unnecessary, the following energy conservation goals from Appendix F of the State CEQA Guidelines are used:

- Decrease overall per capita energy consumption.
- Decrease reliance on fossil fuels such as coal, natural gas, and oil.
- Increase reliance on renewable energy sources.

Though these energy conservation goals are used in this analysis to determine whether long-term operations of the Proposed Project could result in wasteful, inefficient, or unnecessary energy consumption, they are not considered significance thresholds. In other words, even though a project may result in an increase in per capita energy consumption, that does not necessarily mean that the Proposed Project would result in wasteful, inefficient, or unnecessary energy consumption based solely on the amount of energy consumed. Because different land use types consume different types of energy resources at different rates depending on that occupancy's operational objectives and energy needs, comparing the per capita energy consumption of the Proposed Project against the aggregated energy consumption data for the County is informative, but not determinative, of whether that energy consumption is wasteful, inefficient, or unnecessary. Therefore, this analysis focuses on whether the use of that energy resource is carried out in a disproportionate manner in the context of the Appendix F energy conservation goals and explores whether mitigation may be warranted to ensure that the use of energy resources is not considered wasteful, inefficient, or unnecessary. While this analysis does not specifically assess the Proposed Project's peak and base load energy demands, the Proposed Project's potential impacts on overall supply capacity is addressed in Section 3.17, *Utilities and Service Systems*.

METHODOLOGY

Construction

- **Construction Off-Road Equipment.** Fuel usage for construction off-road equipment associated with construction of the Proposed Project are based on fuel usage data from OFFROAD2025, Version 1.1.2. The construction off-road equipment inventories are based on the California Emissions Estimator Model (CalEEMod), Version 2022.1 defaults. See Table 3.2-8, *Construction Activities, Phasing, and Equipment*, of this SEIR, for details on the

construction activities and the start and end dates and equipment inventory for each of the activities.

- **Transportation.** Fuel usage for construction worker, vendor, and haul vehicle trips related to construction activities associated with the Proposed Project are based on fuel usage data from EMFAC2021, Version 1.0.2. Construction worker and vendor trips are based on CalEEMod defaults. Haul trips are based on the anticipated amount of haul material to be exported.

Operational Phase

- **Transportation.** Fuel usage for vehicle trips associated with the proposed land uses accommodated under the Proposed Project and the existing uses within the Project Site are based on fuel usage data from EMFAC2021, Version 1.0.2. Additionally, operational fuel usage calculations utilized average daily trip (ADT) generation and VMT data provided by Fehr and Peers. Overall, the new proposed land uses are projected to generate 49,360 average daily trips and 486,897 vehicle miles traveled per day while the existing remaining uses would generate 39,081 ADTs and 449,063 VMT per day. Overall, the new proposed land uses and the existing remaining uses with the Project Site under year 2050 buildout conditions would generate a combined 88,441 ADTs and 935,960 VMT per day. Existing uses within the Project Site under baseline year 2025 conditions are estimated to generate 45,655 ADTs and 503,279 VMT per day (see Appendix C).
- **Building Energy.** The County may implement all-electric designs for new buildings accommodated under the Proposed Project. However, for purposes for this analysis, new buildings are assumed to be mixed-fuel buildings utilizing both electricity and natural gas and meet Title 24 standards. Overall building energy demands for new buildings accommodated under the Proposed Project are based on the electricity and natural gas energy use intensity (EUI) factors provided by the applicant. For the existing uses within the Project Site, natural gas and electricity demands are based on default CalEEMod energy rates. The default energy rates for nonresidential land uses are based on the California Energy Commission's (CEC) 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). In addition, CalEEMod default natural gas and electricity usage rates for residential uses are based the CEC Residential Appliance Saturation Study (RASS) also completed in 2019. The RASS surveyed 40,000 homes built between 1935 and 2015 with the average home constructed in 1974 (CAPCOA 2022).
- **Electric Vehicle Charging.** Electricity demand from use of electric vehicle (EV) charging stations is based on the 2025 CALGreen power allocation methodologies under Sections 5.106.5.3.6 and 5.106.5.6.3.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.5.4, *Project Impact Analysis*, and 3.5.5, *Cumulative Impact Analysis*.

At the time that the 2014 Master Plan EIR was prepared, Appendix G of the State CEQA Guidelines did not include energy as a stand-alone topic. However, Section 3.15, *Utilities/Service Systems*, of the 2014 Master Plan EIR indirectly addressed energy impacts. The 2014 Master Plan EIR concluded that the 2014 Master would not result in any significant impacts related to energy resources from a supply and capacity perspective. Subsequent addenda to the 2014 Master Plan EIR after December 2018 amendments to the State CEQA Guidelines addressed energy impacts directly in a stand-alone energy section and determined less than significant energy impacts as it pertains to wasteful, inefficient, or unnecessary consumption of energy resources and conflicting or obstructing appliable plans for renewable energy or energy efficiency.

3.5.4 Project Impact Analysis

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

Construction

Construction of the Proposed Project would temporarily increase demand for electricity and vehicle fuels compared to existing conditions. Construction-related energy demand is detailed herein by energy resource type.

Electrical Energy

Construction of the Proposed Project would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. Most construction equipment during demolition and grading would be gasoline or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and finishing. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction

activities. Therefore, construction of the Proposed Project would not result in wasteful or unnecessary electricity demands, and impacts would be **less than significant**.

Natural Gas Energy

It is not anticipated that construction equipment used for the Proposed Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, the project would have **no impact** with respect to natural gas usage.

Transportation Energy

Transportation energy use depends on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. In general, transportation energy use during construction would come from the transport and use of construction off-road equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel, gasoline, and/or electricity. Transportation fuels consumption during the entirety of construction are shown in Table 3.5-7, *Construction-Related Fuel Usage*.

Table 3.5-7 Construction-Related Fuel Usage

Project Component	Gasoline		Diesel		Electricity	
	VMT	Gallons	VMT	Gallons	VMT	kWh
Construction Workers	77,596,589	2,687,396	119,601	3,183	5,240,640	1,928,139
Construction Vendors	1,151,016	187,800	9,992,791	1,042,022	n/a	n/a
Construction Haul Trips	n/a	n/a	3,046,305	487,944	n/a	n/a
Off-Road Equipment	n/a	1,942	n/a	356,001	n/a	n/a
Total	78,747,606	2,877,138	13,158,697	1,889,150	5,240,640	1,928,139

Source: Appendix C

Notes: VMT = vehicle miles traveled; kWh = kilowatt hour

Overall, the use of energy resources by construction vehicles and equipment would fluctuate according to the phase of construction and use of all construction equipment would cease upon completion of construction. To limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. In addition, it is anticipated that construction equipment used for the Proposed Project would be well maintained and meet the appropriate tier ratings per EPA emissions standards, which would in part avoid unnecessary fuel consumption. For example, construction equipment manufacturers are required by law to comply with equipment and vehicle emission standards that are in effect at the time the equipment is manufactured, such as the CAFE standards for on-road vehicles and the EPA's Emission Standards for Nonroad Engines and Vehicles. Moreover, construction contractors would be required to comply with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulations, as applicable, for phasing out use of

older equipment, which would improve average fleetwide equipment fuel efficiency in future years. Construction trips would not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway systems (e.g., I-5, I-10) that provide the most direct routes from various areas of the region. Electrical energy would be available for use during construction from existing power lines and connections, thereby providing on-site power supply and minimizing the need for gasoline or diesel generators. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Proposed buildings envisioned in the Proposed Project would be designed mixed-fuel (e.g., electricity and natural gas); however, an all-electric design may be considered, which would increase electricity demand for building energy use. For the purposes of this analysis, the Proposed Project is assumed to be mixed-fuel. Nonetheless, the effects of switching the building designs to all-electric are discussed herein should this consideration be realized.

Operation of the Proposed Project would involve the use of various transportation fuels (e.g., compressed natural gas, diesel, gasoline, electricity) associated with vehicle transportation. Operational use of electricity and natural gas would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; and lighting. Diesel would also be used for operation of on-site equipment and gasoline for on-site shuttle services. Moreover, the Proposed Project would decommission and remove the existing Central Utility Plant and replace it with a new energy distribution system that could include a centralized replacement utility plant.

As discussed under Section 3.5.3, *Standards for Analysis*, the following energy conservation goals are considered to assist in analyzing whether the Proposed Project's energy consumption could be considered wasteful, inefficient, or unnecessary:

- Decrease overall per capita energy consumption.
- Decrease reliance on fossil fuels such as coal, natural gas, and oil.
- Increase reliance on renewable energy sources.

Building Electricity

Electrical service to Proposed Project would be provided by LADWP through connections to existing on-site and off-site electrical lines and new on-site infrastructure. As shown in Table 3.5-8, *Mixed-Fuel Project Electricity Consumption*, by the full buildout year of 2050, implementation of the Proposed Project would result in a net increase in electricity use of approximately 60,780,544 kWh per year. As a result, the per capita consumption associated with the net

increase in electricity demand from implementation of the Proposed Project would be 3,639 kWh per person per year, which would be below the average County per capita consumption of 6,589 kWh per person per year.

Table 3.5-8 Mixed-Fuel Project Electricity Consumption

Land Use	Electricity Usage (kWh per Year)
Residential	14,443,757
General Office	5,599,109
Medical Office	10,879,149
Retail	2,794,009
Patient and Caregiver Lodging	1,578,800
Education	1,474,116
Warehouse	351,706
Clean Tech/Light Industrial	2,607,268
Hospital	87,527,319
Parking	3,620,927
Community Benefits	1,829,333
EV Charging	31,449,311
Total[1]	**164,154,805**
Existing Uses	103,374,261
Net Change	**60,780,544**
Project Service Population[2]	16,704
Per Capita Annual Consumption	3,639
County Per Capita Consumption	6,589
Comparison Against County Per Capita	(2,951)

Source: Atelier Ten; CalEEMod v2022.1.

Notes: kWh = kilowatt hour. Values in parentheses represent negative numbers. Totals may not add due to rounding.

1. Represents the combined electricity demand associated with the proposed new land uses and the remaining existing uses within the Project Site not designated for demolition under year 2050 buildout conditions.
2. Based on the projected 8,000 residents, 7,482 employees, and 1,222 students that would be generated by the Proposed Project.

As previously discussed, the new proposed uses under the Proposed Project could be designed all-electric. Should this building design consideration be realized, it would increase the electricity demand of the proposed new land uses as shown in Table 3.5-9, *All-Electric Project Electricity Consumption*. As shown in the table, by the full buildout year of 2050, electricity use of the proposed new uses is estimated to be approximately 92,896,766kWh per year with an all-electric building design. As a result, the per capita electricity consumption for the proposed new land uses would be 5,561 kWh per person per year, which would be greater than the 4,866 kWh

per person under the mixed-fuel scenario, but less than the average County per capita consumption of 6,589 kWh per person per year.

Table 3.5-9 All-Electric Project Electricity Consumption: Proposed New Uses

Land Use	Mixed-Fuel Electricity Usage (kWh per Year)[1]	All-Electric Electricity Usage (kWh per Year)[1]	Net Difference (kWh per Year)
Residential	14,443,757	21,402,403	6,958,646
General Office	5,599,109	5,801,775	202,666
Medical Office	9,585,623	9,932,584	346,962
Retail	2,794,009	2,836,994	42,985
Patient and Caregiver Lodging	1,578,800	2,078,312	499,512
Education	1,433,998	1,485,903	51,905
Warehouse	264,478	308,558	44,080
Clean Tech/Light Industrial	2,607,268	2,701,641	94,373
Hospital	7,893,998	10,391,559	2,497,562
Parking	1,797,064	1,797,064	0
Community Facilities	1,829,333	2,710,661	881,328
EV Charging	31,449,311	31,449,311	0
Total	**81,276,749**	**92,896,766**	**11,620,017**
Project Service Population[2]	16,704	16,704	n/a
Per Capita Annual Consumption	4,866	5,561	696
County Per Capita Consumption	6,589	6,589	n/a
Comparison Against County Per Capita	(1,724)	(1,028)	696

Source: Atelier Ten

Notes: kWh = kilowatt hour. Values in parentheses represent negative numbers. Totals may not add due to rounding.

1. Represents the energy demand for the proposed new uses only.
2. Based on the projected 8,000 residents, 7,482 employees, and 1,222 students that would be generated by the Proposed Project.

The Proposed Project would be required to demonstrate compliance with the current Energy Code and CALGreen standards in effect at the time individual applications are submitted to the County and can therefore be expected to be more energy-efficient than the current uses being replaced, resulting in reductions in electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. It should be noted that it is unknown how much more energy-efficient future iterations of the Energy Code and CALGreen standards would be in 2050 compared to existing conditions or the buildout assumptions as

those code updates are released on a 3-year cycle. Nonetheless, the current Energy Code would require that the Proposed Project meet energy efficiency standards for building envelope design, mechanical (e.g., ventilation, heating, cooling) and water distribution design, and on-site renewable power generation (e.g., rooftop solar). The current 2025 Building Energy Efficiency Standards include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and non-commercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Meeting these standards would ensure the Proposed Project minimizes excessive or wasteful electricity consumption through inefficient building designs.

As previously discussed, the Proposed Project would be served by LADWP for electrical service, which has the system capacity to serve the Proposed Project and will be required to meet the SB 100 RPS goal of supplying 100 percent of in-state electricity sales sourced from eligible renewable and carbon-free generation sources by 2045. As such, electricity demand from the Proposed Project would be satisfied by on-site renewable generation (e.g., rooftop solar), increasingly renewably sourced electricity provided by LADWP, or a combination thereof. Therefore, the Proposed Project would contribute to increasingly renewably sourced electricity and would not obstruct LADWP's ability to meet the RPS goal by 2045. As such, the Proposed Project would contribute to an increased reliance of renewable energy resources and a decreased reliance on fossil fuel resources. The Proposed Project would therefore not result in wasteful, inefficient, or unnecessary electricity consumption.

Building Heating Fuels

As shown in Table 3.5-10, *Mixed-Fuel Project Natural Gas Consumption*, implementation of the Proposed Project would result in a net increase of natural gas use by approximately 24,475 MMBTU per year annually with a mixed-fuel building design. As previously discussed, the Proposed Project could be designed all-electric, which would omit natural gas plumbing and appliances, thereby avoiding building-related natural gas consumption. Nonetheless, assuming the Proposed Project is designed mixed-fuel, the per service population consumption associated with the Project-related net increase in natural gas demand is estimated to be 1.5 MMBTU per person per year, which would be less than the County average consumption of approximately 28.7 MMBTU per person per year.

Table 3.5-10 Mixed-Fuel Project Natural Gas Consumption

Land Use	Natural Gas Usage (MMBTU per Year)
Residential	27,929
General Office	812
Medical Office	3,021
Retail	363
Patient and Caregiver Lodging	2,005
Education	327
Warehouse	483
Clean Tech/Light Industrial	378
Hospital	106,117
Parking	0
Community Facilities	3,537
Total[1]	**144,972**
Existing Uses	120,497
Net Change	**24,475**
Project Service Population[2]	16,704
Per Capita Annual Consumption	1.5
County Per Capita Consumption	28.7
Comparison Against County Per Capita	(27.3)

Notes: MMBTU = Million British Thermal Units. Totals may not add due to rounding. Values in parentheses represent negative numbers.

1. Represents the combined natural gas demand associated with the proposed new land uses and the remaining existing uses within the Project Site not designated for demolition under year 2050 buildout conditions.
2. Based on the projected 8,000 residents, 7,482 employees, and 1,222 students that would be generated by the Proposed Project.

Similar to electricity consumption, all new development associated with the Proposed Project would be required to demonstrate compliance with the current Energy Code and CALGreen standards in effect at the time and would result in reductions in heating fuel (e.g., natural gas) consumption on a per dwelling unit and per square foot basis when compared to existing conditions. In addition, because the Proposed Project's buildout would extend through 2045, South Coast AQMD Rule 1146.2 would be relevant to applicable newly installed or replacement large water heaters, small boilers, and process heaters through the buildout of the Proposed Project. Rule 1146.2 establishes phased zero-emission NOx and CO requirements with different compliance dates for equipment in new and existing buildings, beginning in 2026 and concluding by 2033, thereby increasingly directing later phases of development and equipment replacement toward zero-emission, including electric, alternatives. The Proposed Project would therefore not result in wasteful, inefficient, or unnecessary natural gas consumption.

Transportation Energy

The Proposed Project would consume transportation energy from the use of motor vehicles (e.g., gasoline, diesel, compressed natural gas, electricity). Table 3.5-11, *Project Annual Transportation Energy Usage,* shows the net change in fuel usage between the Proposed Project from existing baseline conditions and the per capita fuel consumption associated with the net change in fuels resulting from implementation of the Proposed Project in 2050 compared to the existing County per capita consumption.

As shown in Table 3.5-11, the Proposed Project would result in a net increase in annual fuel consumed by approximately 2,854,521 gallons per year for gasoline, 381,674 gallons per year for diesel, 5,352 gallons per year for compressed natural gas, and 14,333,546 kWh per year from vehicle and equipment use per year. While the Proposed Project would result in an increase in consumption of transportation fuels, the fuel efficiency of vehicles associated with Project-related vehicle trips would not be any different than vehicles associated with non-Project vehicle trips in the region as fuel efficiency in vehicles are based regulated by the CAFE standards. The CAFE standards are not directly applicable to residents or land use development projects, but to car manufacturers. Thus, residents and employees associated with the Proposed Project do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency compared to earlier years and would generally result in an overall benefit of reducing fuel usage by providing more fuel-efficient vehicle options. Furthermore, also as shown in Table 3.5-11, the per capita annual fuel consumption associated with the net increase in Project-related gasoline and diesel fuel consumption of 194 gallons per person year would be below the County per capita consumption of 350 gallons per person per year.

Table 3.5-11 Project Annual Transportation Energy Usage

Resource	Existing Uses (gallons or kWh per year)	Proposed Project Fuel Usage (gallons or kWh per year)[1]	Net Change (gallons pr kWh per year)
Gasoline	6,607,256	9,461,777	2,854,521
Diesel	479,868	861,542	381,674
CNG	19,229	24,581	5,352
Electricity	3,346,290	17,679,836	14,333,546
Total Gasoline and Diesel[2]	**7,087,124**	**10,323,319**	**3,236,196**
Project Service Population[3]	n/a	16,704	16,704
Per Capita Annual Consumption (Gasoline and Diesel)	n/a	n/a	194
County Per Capita Consumption (Gasoline and Diesel)	n/a	n/a	350
Comparison Against County Per Capita (Gasoline and Diesel)	n/a	n/a	(56)

Source: Appendix C

Notes: CNG = compressed natural gas; kWh = kilowatt hour. Totals may not add due to rounding.

1. Includes fuel demands associated with the new proposed land uses and the remaining existing uses within the Project Site not designated for demolition under year 2050 buildout conditions.
2. For accurate comparison against County per capita estimates, the summed total in this table only accounts for gasoline and diesel resources. This table includes compressed natural gas (CNG) and electricity transportation energy consumption from the Proposed Project. The estimates contained in this table include these additional fuel types because CARB's EMFAC used for this analysis reflects County-wide vehicle registrations and considers all fuel types reported in this database. While these fuel types are not comparable against County averages due to the lack of publicly available County-level data for CNG and electricity transportation energy consumption, these Proposed Project consumption estimates are provided for informational purposes.
3. Based on the projected 8,000 residents, 7,482 employees, and 1,222 students that would be generated by the Proposed Project.

In addition, the Proposed Project would result in the development of infill mixed-use land uses near and along designated high quality transit corridors (HQTC) such as Zonal Avenue, Marengo Street, and Mission Road. The Proposed Project would accommodate a variety of land use types such as residential, office, commercial, educational, and retail along these designated HQTCs. The Proposed Project would include a Mobility Hub that would serve local and regional bus connectivity, an internal campus shuttle, and a bicycle parking station in addition to rideshare drop-offs and a fleet of car-share vehicles. Additionally, the proposed pedestrian network would be designed to align with existing pedestrian routes and crosswalks to improve connectivity of the Project Site to the larger surrounding communities. Similarly, the proposed bicycle

circulation would also be designed to align with existing bicycle infrastructure and would build upon the existing bikeway along Mission Road that connects into networks along the Los Angeles River and towards Downtown. Furthermore, vehicle circulation would be limited within the main campus and would be directed to designated drop-off areas and parking garages. Overall, these designs would support active transit and use of public transit. These features and components of the Proposed Project above would promote alternative modes of transportation such as walking and biking in addition to utilizing public transit, which could contribute to minimizing passenger vehicle trips. As shown in Table 3.15-4, *Proposed Project VMT Measured Against Existing Countywide VMT*, of Chapter 3.15 of this Draft SEIR, the Proposed Project would result in a residential and work VMT per capita that are less than the County-wide averages. Therefore, the Proposed Project would not result in wasteful, inefficient, or unnecessary transportation energy consumption.

Summary

As previously discussed, the State CEQA Guidelines Appendix F energy conservation goals are utilized herein to assist in assessing whether the Proposed Project would result in the wasteful, inefficient, or unnecessary consumption of energy resources. The three aforementioned Appendix F energy conservation goals include: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and 3) increasing reliance on renewable energy sources. While comparing the Proposed Project's net increase in energy consumption against County averages is informative, it is not determinative of whether a significant energy impact may occur. This is because the County averages account for averages across all end uses in the County and more energy- and operational-intensive end uses may result in higher energy demands while not resulting in wasteful, inefficient, or unnecessary energy consumption. Moreover, the energy estimates utilized in this analysis reflect conservative assumptions for building design where implementation of the Proposed Project is likely to result in greater efficiencies than is assumed herein. For instance, electric appliances for domestic hot water heating and air conditioning are conservatively assumed to be resistance electric where compliance with the Energy Code will in many cases require heat pump electric equipment, resulting in lower energy demands than what is assumed.

As shown in Table 3.5-8 through Table 3.5-10, the per capita fuel consumption rates associated with the electricity, natural gas, and gasoline and diesel demands resulting from implementation of the Proposed Project would be below the County average under both the mixed-fuel design scenario and the all-electric design scenario. As previously discussed, these estimates include conservative assumptions that result in higher estimated energy demands, and County average consumption rates reflect the average across all end uses. In addition, the Proposed Project would result in the partial redevelopment of the Los Angeles County General Hospital and supporting uses, which reflects a generally more energy- and operation-intensive end use than is reflected on average across the County. As such, the Proposed Project is

expected to result in a lower overall per capita energy consumption rate, consistent with the first Appendix F energy conservation goal.

As previously discussed, with LADWP compliance with the State's Renewable Portfolio Standard Program, electricity provided to the Proposed Project would be increasingly procured from renewable and carbon-free electricity generation sources through 2045. Moreover, the Proposed Project considers an all-electric building design for the new proposed land uses, which would further reduce potential natural gas consumption should this design option be realized. Should the all-electric building design option not be realized, the Energy Code would require the proposed buildings to incorporate electric readiness measures to include conduit and panel sizing necessary to accommodate future conversions to an all-electric design. Furthermore, the per capita fuel consumption associated with the net increase in gasoline and diesel demand resulting from implementation of the Proposed Project would be less than the County average, primarily resulting from a reduction in per capita VMT generation, as described in greater detail in Chapter 3.15. In addition, the vehicles used for resident, employee, and patient transportation to and from the Proposed Project would be compliant with the applicable CAFE standards for that vehicle category and model year, which incrementally improves fleet-wide fuel efficiencies in later years. And the EV charging provided by the Proposed Project would further facilitate the adoption of EVs in place of internal combustion engine vehicles for transportation activities. Thus, the Proposed Project would support decreased reliance on fossil fuels and increased reliance on renewable sources, consistent with the second and third Appendix F energy conservation goals. Therefore, energy impacts associated with implementation of the Proposed Project would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction and Operation

Energy Action Plan

As discussed previously, the Energy Action Plan was last updated in 2008 and was developed by the CPUC, CEC, and California Power Authority to create a unified State energy policy framework. It serves as one of the State's strategies for planning for reliable, affordable, and environmentally responsible energy procurement and supply. The Energy Action Plan further establishes a "loading order" in identifying priorities for statewide energy planning efforts, which translates into first prioritizing meeting existing demand with cost-effective energy efficiency and demand response efforts, then using renewable energy resources and distributed generation, and finally meeting the remaining energy demand with renewable or otherwise

"clean" fossil-fuel power generation resources (e.g., renewable natural gas). Other priorities identified in the Energy Action Plan but not directly related to local agencies, include modernizing transmission and distribution infrastructure, enhancing reliability in electricity and natural gas markets, and ensuring affordable access to all Californians. Therefore, a long-range planning document, such as the Proposed Project, can be assessed for consistency with the Energy Action Plan by examining how its implementation generally supports or conflicts with the strategies of the plan, such as promoting energy resource deployment consistent with the plan's loading order.

The land use development projects accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Additionally, any LADWP electricity provided to the proposed uses accommodated by the Proposed Project would be increasingly sourced from renewable generation sources in future years as a result of compliance with the RPS standards. Therefore, the Proposed Project would be consistent with the Energy Action Plan strategies.

County of Los Angeles 2045 CAP

The 2045 CAP is a comprehensive and actionable plan for implementing the GHG emissions reduction policies of the Air Quality Element and for reducing GHG emissions in the unincorporated areas of the County. Table 3.5-12, *Consistency with the County of Los Angeles 2045 CAP*, evaluates consistency of the Proposed Project to the 2045 CAP strategies and measures related to increasing energy efficiency and renewable energy production and use. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as the 2045 CAP, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As shown in Table 3.5-12, the Proposed Project would not conflict with the 2045 CAP.

Table 3.5-12 Consistency with the County of Los Angeles 2045 CAP

Strategy	Measures	Consistency
Strategy 1: Decarbonize the Energy Supply	▪ Measure ES1: Develop a Sunset Strategy for All Oil and Gas Operations ▪ Measure ES2: Procure Zero-Carbon Electricity ▪ Measure ES3: Increase Renewable Energy Production ▪ Measure ES4: Increase Energy Resilience ▪ Measure ES5: Establish GHG Requirements for New Development	**Consistent.** The land use development activities accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include prescriptive PV system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Compliance with these requirements is compatible with the County's goal of decarbonizing the energy supply.
Strategy 5: Decarbonize Buildings	▪ Measure E1: Decarbonize Existing Buildings ▪ Measure E2: Decarbonize New Development ▪ Measure E3: Other Decarbonization Actions	**Consistent.** The future land use development projects accommodated under the Proposed Project would be required to comply with the Building Energy Efficiency Standards and CALGreen. Through adaptive reuse of the existing General Hospital Building, which contains highly outdated and inefficient energy infrastructure, the Proposed Project would be in alignment with this strategy.
Strategy 6: Improve Efficiency of Existing Building Energy Use	▪ Measure E4: Improve Energy Efficiency of Existing Buildings	**Consistent.** Through adaptive reuse of the existing General Hospital Building, which contains highly outdated and inefficient energy infrastructure, the Proposed Project would include new energy efficiency features and standards that would be in alignment with this strategy.

Source: County of Los Angeles 2024.

Long-Term Energy Efficiency Strategic Plan

As discussed previously, the Long-Term Energy Efficiency Strategic Plan was last updated in 2011 and serves as the State's long-term roadmap to make energy efficiency a top priority in supporting California's grid harmonization and renewable energy integration efforts. As discussed, key policies contained therein include achieving a zero net energy performance for all new residential construction by 2020 and all new commercial construction by 2030. While the

2020 benchmark goal for new residential construction has since passed, the goal continues to underpin the triennial updates to the CBSC and Energy Code. The Long-Term Energy Efficiency Strategic Plan serves as a living strategic document for State and local agencies and emphasizes the integration of energy efficiency policies and measures into planning efforts as a critical component to advancing the objectives of the plan. Therefore, a Community Plan, such as the Proposed Project, can be assessed for consistency with the Long-Term Energy Efficiency Strategic Plan by examining how its implementation generally supports or conflicts with the strategies of the plan, such as promoting compact in-fill development, green building standards, and zero net energy readiness.

As discussed in impact discussion (a), the Proposed Project would redevelop the Project Site to include new buildings that would meet the Energy Code and CALGreen standards in effect at the time individual permits are applied for. The Proposed Project would result in improved building energy efficiencies through compliance with the Energy Code and CALGreen. Should the all-electric building designs be realized for the Proposed Project, the strategies of the Long-Term Energy Efficiency Strategic Plan would be further advanced by meeting building energy demand with electricity supplied from on-site power generation or LADWP, which will be required to provide 100 percent of in-state sales of electricity sourced from eligible renewable and carbon-free generation sources by 2045.

Therefore, the Proposed Project would be consistent with the Long-Term Energy Efficiency Strategic Plan strategies and this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.5.5 Cumulative Impact Analysis

As this analysis assesses whether energy consumption from the Proposed Project would result in wasteful, inefficient, or unnecessary consumption of resources, the geographic area relevant to cumulative energy impacts includes the Project Site. As discussed, the 2014 Master Plan EIR did not analyze energy as a distinct environmental issue. Consequently, the certified EIR did not identify or determine cumulative impacts associated with energy, specifically. In accordance with current State CEQA requirements, this Draft SEIR includes a focused analysis of potential cumulative impacts related to energy.

Analysis of whether the Proposed Project's energy demand would be within LADWP's and SoCalGas's service capacity and require new or expanded facilities is provided in Section 3.17, *Utilities and Service Systems*, of this Draft SEIR.

Would the project have a cumulative effect related to energy?

Cumulative impacts would occur if a series of actions lead to a wasteful, inefficient, or unnecessary consumption of energy resources or a conflict with or obstruction of a State or local plan for renewable energy and energy efficiency.

Wasteful, Inefficient, or Unnecessary Energy Consumption

Construction

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects, result in energy impacts during construction that are typically associated with consumption of fuel by construction equipment and haul trucks, as well as electricity used for temporary power.

Construction of the Proposed Project would result in temporary increases in energy demand due to the use of heavy-duty equipment, construction vehicles, and worker trips. However, construction activities would occur over a limited duration and would not represent a long-term or permanent increase in energy demand. Additionally, construction equipment would be required to comply with applicable regulations, including anti-idling requirements and efficiency standards, which would reduce fuel consumption.

As previously mentioned, the geographic area relevant to cumulative energy impacts includes the Project Site. Other cumulative projects at the Project Site, which are identified in Table 3-2, *List of Cumulative Projects*, would also require construction-related energy use. Cumulative projects at the Project Site include the Medical Examiner Crypt Expansion, Medical Examiner Seismic Retrofit, and Medical Examiner Deferred Maintenance Repair Project. Construction energy demand for these projects combined with the Proposed Project would be temporary and staggered over time depending on construction schedules. As discussed in impact discussion (a), the Proposed Project's construction energy consumption would not be wasteful, inefficient, or unnecessary. Combined with these cumulative projects, construction energy demand is not anticipated to be cumulatively considerable as construction fleet operators would utilize vehicles and equipment whose manufacturers are required to meet applicable fuel efficiency standards for off-road vehicles and equipment and on-road vehicles.

Given the temporary nature of construction activities and regulatory requirements promoting efficient fuel use, the Proposed Project's incremental contribution to cumulative construction energy impacts would not be cumulatively considerable. Therefore, cumulative construction-related energy impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

As previously discussed, the Proposed Project would result in a long-term increase in operational energy demand for electricity and natural gas use. However, all improvements developed within the Project Site and surrounding area would implement the applicable requirements of the Energy Code and CALGreen and would subsequently reduce wasteful, inefficient, or unnecessary energy consumption through improved construction site management and building design. As identified in Table 3-2, cumulative projects at the Project Site include the Medical Examiner Crypt Expansion, Medical Examiner Seismic Retrofit, and Medical Examiner Deferred Maintenance Repair Project. New buildings associated with the Proposed Project and other cumulative projects on the Project Site would also be required to use energy-efficient appliances and equipment that comply with the Title 20 Appliance Efficiency Regulations. Moreover, as discussed in Section 3.17.5, *Cumulative Impact Analysis*, of Section 3.17, the Proposed Project's electricity and natural gas consumption would be within the supply capacities of LADWP and SoCalGas, respectively, and would not result in the need for new or expanded facilities.

The Proposed Project would also generate additional annual VMT, and thus fuel consumption. However, vehicles associated with the Proposed Project and other cumulative projects identified in Table 3-2 that are on the Project Site would be subject to the USEPA's CAFE standards for vehicular fuel efficiency, and average corporate fuel economy continues to improve as a result of State and federal laws, including the Pavley Advanced Clean Cars program. Incremental vehicle turnover as older vehicles age out of use further improves the overall fuel economy of California's vehicle fleets. Furthermore, and as stated, the Proposed Project would result in a residential and work VMT per capita that are less than the County-wide averages. The Proposed Project in combination with other cumulative projects on the Project Site would not result in a cumulative contribution to energy impacts. Cumulative impacts would therefore be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Renewable Energy or Efficiency Plan

Construction

Cumulative impacts related to conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing energy consumption or increasing the use of renewable energy during construction would be less than significant.

Construction activities are not typically subject to long-term operational energy efficiency standards such as Title 24; however, construction would be required to comply with applicable state and local regulations governing fuel use and equipment fuel efficiency, including anti-idling

requirements. These regulations are consistent with statewide goals to reduce energy consumption and emissions and would apply to vehicles and equipment utilized for construction of the Proposed Project and other cumulative projects at the Project Site.

Other cumulative projects at the Project Site which are identified in Table 3-2 would also use vehicles and equipment whose manufacturers are required to ensure compliance with the same fuel use and fuel efficiency regulations. Because construction activities are temporary and do not establish long-term energy use patterns, they would not conflict with or obstruct implementation of applicable energy plans or policies.

Therefore, the Proposed Project's contribution to cumulative impacts related to plan and policy conflicts during construction would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Operational energy use associated with the Proposed Project would be subject to applicable state and local plans, policies, and regulations adopted for the purpose of reducing energy consumption and increasing the use of renewable energy.

All development under the Proposed Project would be required to comply with the building code standards contained in Title 24, which in part establish energy performance requirements for buildings and are updated periodically to increase energy efficiency and support statewide renewable energy goals. In addition, the Proposed Project would be required to comply with applicable State mandates, such as renewable energy portfolio standards and building electrification trends, as well as any applicable local energy or climate action plans.

Other cumulative projects at the Project Site include the Medical Examiner Crypt Expansion, Medical Examiner Seismic Retrofit, and Medical Examiner Deferred Maintenance Repair Project. These projects combined with the Proposed Project would collectively be required to comply with the applicable energy-efficiency standards promulgated by State agencies intended for improving overall energy efficiency in the State of California, such as meeting Title 24 Energy Code standards for building design and meeting Title 20 standards for new appliance energy efficiency. Therefore, while other past, present, and reasonably foreseeable future projects would also increase energy demand, they would not be expected to conflict with applicable energy plans and policies.

As discussed in impact discussion (b), the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Proposed Project's incremental contribution to cumulative impacts related to plan and policy conflicts would not be cumulatively considerable. Accordingly, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.5.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.5.4, *Project Impact Analysis*, and 3.5.5, *Cumulative Impact Analysis*, the Proposed Project would result in less than significant impacts related to wasteful, inefficient, or unnecessary energy consumption and consistency with applicable State and local plans for energy efficiency and renewable energy.

As stated, at the time that the 2014 Master Plan EIR was prepared, Appendix G of the State CEQA Guidelines did not include energy as a stand-alone topic. Thus, the 2014 Master Plan EIR did not evaluate energy impacts related to the Appendix G energy-related thresholds listed above in Section 3.5.3 of this Draft SEIR. However, the subsequent CEQA addenda to the 2014 Master Plan EIR prepared after December 2018 determined less than significant energy impacts as it pertains to wasteful, inefficient, or unnecessary consumption of energy resources and conflicting or obstructing applicable plans for renewable energy or energy efficiency. Overall, the Proposed Project would result in less than significant energy impacts. Thus, it would not result in new or greater energy impacts.

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3.6 GEOLOGY AND SOILS

This chapter of the Draft SEIR discusses the Project Site's geologic setting and evaluates the potential impacts related to geology and soils and paleontological resources from the implementation of the Proposed Project. As necessary, it recommends mitigation measures to avoid/reduce significant impacts of the Proposed Project.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, no comments were received regarding geology and soils impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where one comment regarding geology and soils was received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. Comments related to geology and soils were considered in the preparation of this analysis.

Preparation of this analysis was informed by multiple geotechnical investigations prepared for the areas within the Project Site. These reports, spanning from 2018 through 2025, provide both Campus-wide baseline information and localized subsurface data for specific areas around the Project Site. Together, they establish the technical foundation for the evaluation of geology, seismicity, soils, and related hazards presented in this chapter. The reports include:

- *Geotechnical Investigation, Proposed L.A. Co.: USC Medical Center Child Care Project, N. State Street between Zonal Avenue and Marengo Street, Los Angeles, California.* Prepared by RMA Group for Los Angeles County Department of Public Works. March 30, 2018. (Appendix F.1 of this Draft SEIR)
- *Geotechnical Investigation, Proposed Health Agency Recuperative Campus, 1774 Zonal Avenue, Los Angeles, California.* Prepared by Geocon West, Inc. for KFA, LP. April 9, 2018. (Appendix F.2 of this Draft SEIR)
- *Geotechnical Report, LAC+USC Medical Center, Women's and Children's Hospital Demolition Project, Los Angeles, California.* Prepared by Geocon West, Inc. for Los Angeles County Department of Public Works. May 20, 2019. (Appendix F.3 of this Draft SEIR)
- *Final Geotechnical Investigation and Bulk Factor Report, Women's and Children's Hospital Demolition, LAC+USC Medical Center, 1240 North Mission Road, Los Angeles, California.* Prepared by AECOM for Los Angeles County Department of Public Works. 2019. (Appendix F.4 of this Draft SEIR)
- *Report of Geotechnical Investigation for Structural Condition Assessment and Seismic Evaluation, LAC+USC Medical Center: Old Pharmacy Warehouse Project, 1100 N. Mission Road, Los Angeles, California.* Prepared by Geotechnical Professionals Inc. for Los Angeles County Department of Public Works. November 7, 2022. (Appendix F.5 of this Draft SEIR)
- *Geotechnical Engineering Assessment Los Angeles County General Hospital Redevelopment Proposed Stabilization Project, Los Angeles County General Hospital Campus 1200 North*

State Street, Los Angeles, California. Prepared by Geotechnologies, Inc. for Centennial Partners. August 29, 2025. (Appendix F.6 of this Draft SEIR)

- *Phase I Cultural Resources Assessment*, *Los Angeles County General Hospital Master Plan*. Prepared by Envicom Corporation for Centennial Partners. April 2026. (Appendix E.1 of this Draft SEIR)

3.6.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations.

FEDERAL

American Antiquities Act of 1906

The American Antiquities Act (16 US Code secs. 431–433) protects cultural resources in the United States by prohibiting appropriation, excavation, injury, or destruction of "any historic or prehistoric ruin or monument, or any object of antiquity" located on lands owned or controlled by the federal government. The act also establishes penalties for such actions and sets forth a permit requirement for collection of antiquities on federally owned lands. Neither the American Antiquities Act itself nor its implementing regulations (Code of Federal Regulations, Title 43, Part 3) specifically mentions paleontological resources. The act also provides the authority for the creation of national monuments, which afford additional protection for natural, cultural, and scientific features, among other things. However, many federal agencies have interpreted objects of antiquity as including fossils. Consequently, the American Antiquities Act represents an early cornerstone for efforts to protect the nation's paleontological resources.

Paleontological Resources Preservation Act

Enacted as part of the Omnibus Public Land Management Act (2009), the Paleontological Resources Preservation Act (16 US Code sec. 470) requires the Secretaries of the Interior and Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The Paleontological Resources Preservation Act includes specific provisions addressing management of these resources by the Bureau of Land Management, the National Park Service, the Bureau of Reclamation, the U.S. Fish and Wildlife Service, and the US Forest Service. The Paleontological Resources Preservation Act affirms the authority for many of the policies that the federal land-managing agencies already have in place for paleontological

resources, such as issuing permits for collecting paleontological resources, curation of paleontological resources, and confidentiality of locality data.

STATE

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was enacted in California to address hazards associated with surface faulting. The law was a direct result of the 1971 San Fernando earthquake, which caused extensive surface fault rupture—the most easily avoided seismic hazard—and resulted in damage to numerous homes, commercial buildings, and other structures. The act provides a mechanism for reducing surface fault rupture losses statewide. Its intent is to ensure public safety by prohibiting the siting of most structures intended for human occupancy across traces of active faults that present a potential hazard from surface faulting or fault creep. A component of the Alquist-Priolo Earthquake Fault Zoning Act is the requirement that the California Geological Survey map Earthquake Fault Zones around active faults and make these maps available to cities and counties for use in land use planning and development review. Within designated Earthquake Fault Zones, site-specific geologic investigations are required prior to approval of most structures for human occupancy to demonstrate that buildings will not be constructed across active fault traces.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act addresses earthquake hazards unrelated to surface fault rupture, including those associated with liquefaction and seismically induced landslides. Passed in 1990 and effective in 1991, the act's purpose is to identify and map seismic hazard zones. This information can be used by cities and counties in preparing the safety elements of their general plans, thereby encouraging land use management policies and regulations that reduce seismic hazards. The act has resulted in the preparation of maps that delineate liquefaction zones and earthquake-induced landslide zones of required investigation (California Department of Conservation, California Geological Survey 2007).

California Building Standards Code

The California Building Standards Commission (Commission) is responsible for coordinating, managing, adopting, and approving building codes in California. The California Building Standards Code (CBSC) is codified in the California Code of Regulations (CCR) Title 24. The most recent version, the 2022 CBSC, was adopted by the Commission in 2022 and became effective January 1, 2023.

The State of California provides minimum standards for building design through the 2022 California Building Code (CBC), a component of the CBSC. Chapters 16 through 18 of the CBC regulate structural design, structural tests and inspections, and soils and foundations. The CBC

applies to building design and construction in the state and is based on the International Building Code (IBC), which is used widely throughout the country (generally adopted on a state-by-state or district-by-district basis).

The CBC, which has been modified for California conditions, contains numerous provisions that are more stringent than those in the Uniform Building Code (UBC) because of California's seismic and environmental conditions. According to Section 1613 of the CBC, "[e]very structure, and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, shall be designed and constructed to resist the effects of earthquake motions in accordance with ASCE 7."[1]

Requirements for Geotechnical Investigations

Requirements for geotechnical investigations are included in Appendix J, Section J104 (Engineered Grading Requirements) of the CBC. As outlined in Section J104, applications for a grading permit are required to be accompanied by plans, specifications, and supporting data consisting of a soils engineering report and engineering geology report. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness.

National Pollutant Discharge Elimination System Permit Program

The National Pollutant Discharge Elimination System (NPDES) Permit Program was established under the federal Clean Water Act to regulate discharges of pollutants from point sources into waters of the United States. In California, the program is administered by the State Water Resources Control Board and nine Regional Water Quality Control Boards. Under the NPDES program, stormwater discharges associated with construction activities that disturb one acre or more must comply with the Construction General Permit, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify and incorporate best management practices (BMPs) to control erosion, sedimentation, and pollutant discharges during construction. In addition, certain operational stormwater discharges are regulated through municipal separate storm sewer system (MS4) permits, which require ongoing implementation of BMPs to reduce pollutants in stormwater runoff to the maximum extent practicable.

[1] ASCE 7 is a document published by the American Society Of Civil Engineers (ASCE) that specifies minimum design loads for buildings and other structures.

California Environmental Quality Act and State CEQA Guidelines Protection for Paleontological Resources

The California Environmental Quality Act (CEQA) statute (California Public Resources Code [PRC] secs. 21000 et seq.) includes "objects of historic … significance" in its definition of the environment (PRC sec. 21060.5), and Section 15064.5 of the State CEQA Guidelines further states that a resource is "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC sec. 5024.1; 14 CCR sec. 4852), including the criteria that the resource has "yielded, or may be likely to yield, information important in prehistory or history." This has been widely interpreted as extending CEQA consideration to paleontological resources. In addition, Appendix G of the State CEQA Guidelines specifically includes evaluation of impacts to unique paleontological resources in the Geology and Soils topic.

California Public Resources Code

The California PRC protects paleontological resources in specific contexts. In particular, PRC Section 5097.5 prohibits "knowing and willful" excavation, removal, destruction, injury, and defacement of any paleontological feature on public lands without express authorization from the agency with jurisdiction. Violation of this prohibition is a misdemeanor and is subject to fine and/or imprisonment (5097.5(c)), and persons convicted of such a violation may be required to provide restitution (5097.5(d)(1)). Additionally, PRC Section 30244 requires "reasonable mitigation measures" to address impacts on paleontological resources identified by the State Historic Preservation Officer.

LOCAL

County of Los Angeles Code of Ordinances

- **Title 22, Section 22.46.480.** Requires a comprehensive geologic and soils report from a registered geologist for any grading or development on the project site.
- **Title 22, Section 22.46.1570.** Provides requirements for the identification, evaluation, and protection of paleontological resources during development activities.
- **Title 22, Section 22.44.2060.** ("Hazards Area" provisions): Establishes geological and soil hazard zones and requires site-specific analysis and hazard mitigation for development within these areas.

Site-specific geotechnical investigations will be conducted during future project design in accordance with applicable building code requirements to address localized subsurface conditions.

County of Los Angeles General Plan 2035

The Los Angeles County General Plan (LA County General Plan 2035) includes goals and policies to ensure development is designed and constructed in accordance with the applicable building codes and engineering requirements that address geologic hazards, as discussed below (County of Los Angeles 2025).

Conservation and Natural Resources Element

The Conservation and Natural Resources Element of the LA County General Plan 2035 guides the long-term conservation of natural resources and preservation of available open space area. The following policy from the Conservation and Natural Resources Element is relevant to the Proposed Project:

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Safety Element

The Safety Element of the LA County General Plan 2035 provides goals and policies with the purpose of reducing the potential risk of death, injuries, property damage, economic loss, and social dislocation resulting from natural and human-made hazards. The following policies from the Safety Element are relevant to the Proposed Project:

- **Policy S 1.1.** Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.
- **Policy S 1.2.** Prohibit construction of structures for human occupancy adjacent to active faults unless a comprehensive fault study that addresses seismic hazard risks and proposes appropriate actions to minimize the risk is approved.
- **Policy S 1.4.** Support the retrofitting of unreinforced masonry structures and soft-story buildings to help reduce the risk of structural and human loss due to seismic hazards.

County of Los Angeles Municipal Separate Storm Sewer System Permit

The Proposed Project is subject to the waste discharge requirements of the NPDES Permit No. CAS004004 and the County of Los Angeles MS4 Permit (Order No. R4-2021-0105), which was effective September 11, 2021. The Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities in Los Angeles County (except Long Beach) are permittees under the MS4 Permit. The permit contains requirements that are necessary to improve efforts to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and achieve water quality standards. This permit requires that runoff is addressed during the major phases of urban development (planning, construction, and operation) to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit nonstorm water discharges, and protect receiving waters. The MS4 Permit also includes

construction requirements for implementation of minimum construction site BMPs for erosion, sediment, nonstorm water management, and waste management on construction sites. A detailed discussion of the waste discharge requirements under the NPDES Permit and MS4 Permit is provided in Section 3.9, *Hydrology and Water Quality*.

Low Impact Development Standards Manual

The County of Los Angeles adopted the Low Impact Development (LID) Standards Manual in February 2014 to comply with the requirements of the 2012 Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175, NPDES Permit No. CAS004001). The Project Site is currently subject to the MS4 Permit (Order No. R4-2021-0105), which continues to require implementation of post-construction stormwater control measures, including those related to erosion addressed in this chapter, consistent with the County's LID standards. The LID Standards Manual establishes design requirements for new development and redevelopment projects in unincorporated areas of the County to minimize hydrologic impacts, reduce pollutant loadings, and promote groundwater recharge. LID strategies emphasize retention and infiltration of stormwater on-site to the maximum extent practicable through the use of bioretention areas, permeable surfaces, disconnected drainage, and other distributed best management practices. From a geotechnical perspective, the LID Manual requires site-specific geotechnical evaluations of soil type, infiltration capacity, groundwater depth, and slope stability to determine the feasibility and safety of implementing infiltration-based control measures. Projects must submit a comprehensive LID Plan, including geotechnical testing and design recommendations, to demonstrate compliance with County Code Title 12, Chapter 84, as amended in 2013. A detailed discussion of stormwater quality and LID design is provided in Section 3.9, *Hydrology and Water Quality*.

3.6.2 Existing Conditions

REGIONAL GEOLOGY

The Project Site is located within the Peninsular Ranges Geomorphic Province of southern California. This geomorphic province encompasses an area that extends approximately 125 miles from the Transverse Ranges and the Los Angeles Basin south past the Mexican border and another 775 miles to the tip of Baja California. The Peninsular Ranges province varies in width from approximately 30 to 100 miles and is characterized by northwest-trending mountain range blocks separated by similarly northwest trending faults.

The Project Site is in the Repetto Hills, northeast of downtown Los Angeles, in the Los Angeles Basin. The Repetto Hills are composed of Upper-Miocene-age, fine-grained, sedimentary rock of the Puente Formation and uplifted alluvial deposits. Small, secondary folds on the Elysian Park Anticline have resulted in bedding dipping steeply to the northeast and southwest (Geotechnologies Inc. 2025).

The Los Angeles Basin is divided into four structural blocks, including uplifted zones. The structural blocks are generally bounded by fault systems. The Project Site is within the Central block, which is largely a synclinal[2] depression (Ninyo and Moore 2014).

The Central block is bounded on the southwest by the Newport-Inglewood fault zone; on the northwest by the Santa Monica-Hollywood-Raymond Hill fault system; and on the northeast by the Whittier and Elysian Park fault system (Ninyo and Moore 2014). Active northwest-trending fault zones in the Peninsular Ranges province include the San Jacinto fault zone, Elsinore fault zone (Whittier fault), and Newport-Inglewood fault zone (Ninyo and Moore 2014). Figure 3.6-1, *Regional Faults*, shows the approximate Project Site location relative to the principal faults in the region. These systems represent a key seismic hazard for the Campus, with regional seismicity dominated by right-lateral strike-slip fault movement (Ninyo & Moore 2014; Geocon West Inc. 2019 [Appendix F.3]).

The predominant rock type that underlies the Peninsular Ranges province is a Cretaceous-age igneous rock (granitic rock) referred to as the Southern California batholith. Older Jurassic-age metavolcanic and metasedimentary rocks and older Paleozoic limestone, altered schist, and gneiss are present within the province. Cretaceous-age marine sedimentary rocks and younger Tertiary-age rocks that consist of volcanic, marine, and non-marine sediments overlie the older rocks. More recent Quaternary sediments, primarily of alluvial origin, comprise the low-lying valley and drainage areas within the region, including the area where the Project Site is located (Ninyo and Moore 2014).

SITE GEOLOGY

Geotechnologies, Inc. explored the Project Site on July 14 through July 17, 2025, and excavated eleven borings and two test pits. The borings were drilled to depths between 20 and 50 feet below the existing grade. The test pits were excavated to depths of 13 and 20 feet below the existing grade. The 11 borings were distributed across the Project Site, including locations within the proposed building footprint, adjacent improvement areas, and along the site perimeter, to evaluate subsurface conditions beneath areas of planned grading, foundation support, and site improvements (Geotechnologies Inc. 2025).

In addition to the 2025 investigation, prior geotechnical studies have been completed within and adjacent to the Project Site including a preliminary geotechnical evaluation for the 2014 Master Plan, and site specific geotechnical studies for the USC Medical Center Child Care project, the Health Agency's Recuperative Campus project, the Women's and Children's Hospital demolition project, the Old Pharmacy Warehouse Project, and the Los Angeles County General Hospital Redevelopment Proposed Stabilization Project.

[2] In structural geology, a syncline is a fold, with the youngest layers closest to the center of the structure.

These investigations included borings advanced to depths exceeding 50 feet below grade in some locations and laboratory testing of subsurface materials. Relevant subsurface data from these prior reports were reviewed and considered to supplement the 2025 exploration results (Ninyo & Moore 2014; RMA Group 2018; Geocon West, Inc. 2018 [Appendix F.2]; Geocon West, Inc. 2019 [Appendix F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]; Geotechnologies Inc. 2025 [Appendix F.6]).

Based on the exploratory excavations conducted by Geotechnologies, Inc. and the previous geotechnical consultants, it was confirmed that the Project Site is underlain by fill materials, natural alluvium, and bedrock of the Puente Formation (Geotechnologies Inc. 2025 [Appendix F.6]).

Fill Materials

Previous geotechnical evaluations at the Project Site encountered artificial fill soils in areas related to the original development of the Medical Center. The soils encountered were generally comprised of silty clay and silty to clayey sand (Ninyo & Moore 2014).

Based on the site exploration conducted by Geotechnologies, Inc., the depth of fill throughout the Project Site varies widely. The deepest fill was observed along the southern and central portions of the Project Site, where the fill was observed to extend to a depth of 22.5 feet below the existing grade. The composition of the fill was also widely variable, consisting of a mixture of clay, silt, sand, and recompacted siltstone and sandstone. The fill was generally moist, stiff to very stiff, or medium dense to very dense, and fine to medium grained, with occasional brick, concrete, and rock fragments. A compaction report documenting the existing fill was not located. Therefore, Geotechnologies Inc. considered the existing fill to be uncertified (Geotechnologies Inc. 2025 [Appendix F.6]).

Geotechnical investigations conducted by GPI in 2022 identified undocumented fill extending up to 10 feet below grade on the north side of the Pharmacy building and up to 18 feet on the south side, consisting of loose silty sands, silty clays, and construction debris such as concrete, lumber, and brick fragments (GPI 2022 [Appendix F.5]).

Similarly, the 2019 geotechnical investigation for the Women's and Children's Hospital area observed undocumented fill containing construction debris and loose silty soils overlying native alluvium (AECOM 2019 [Appendix F.4]).

Alluvium

Within most of the Project Site, particularly within the lower elevation areas, Geotechnologies Inc. observed the fill to be underlain by native alluvial soils. The alluvial soils consisted of interlayered mixtures of sandy to silty clay, sandy to clayey silt, silty to clayey sand, and sand. The alluvial soils were moist to wet, stiff to very stiff, or medium dense to very dense, and fine

to coarse grained, with occasional pebbles and gravel (Geotechnologies Inc. 2025 [Appendix F.6]).

Geotechnical investigations conducted by GPI in 2022 identified layers of younger and older alluvial soils underlying fill. The alluvial soils were made up of firm to very stiff clays and silts, along with dense sands (GPI 2022 [Appendix F.5]).

The 2019 geotechnical investigation for the former Women's and Children's Hospital area observed native alluvium underlying fill. Native soils in this portion of the Project Site consisted of medium dense to very dense sands and gravels interbedded with firm to very stiff silts and clays (AECOM 2019 [Appendix F.4]).

Bedrock of the Puente Formation

Puente Formation generally comprised of interbedded sandstone and shale was observed in open space areas in the northeast corner of the Project Site during the 2014 geologic reconnaissance (Ninyo & Moore 2014). Some of the exploratory excavations conducted within the central area of the Project Site in 2025 also identified bedrock of the Puente Formation at depths between 1 and 24.5 feet below the existing grade. Based on Geotechnologies Inc.'s review of the exploration logs, the bedrock appeared to be shallow in the higher site elevations, around General Hospital, and deepen toward the north, south, and west. The observed bedrock consisted of siltstone and sandstone, which was moist, moderately hard to hard, occasionally weathered, and generally well bedded. From all the excavations conducted in 2025 within the Project Site, bedrock bedding could only be recorded in Borings B1 and B2. The bedding observed in these two borings dipped between 43 and 64 degrees to the southwest (Geotechnologies Inc. 2025 [Appendix F.6]).

Geotechnical investigations conducted by GPI in 2022 identified bedrock of the Puente Formation, consisting of siltstone and sandstone, at depths of about 18 to 35 feet. This bedrock is generally very dense and strong, though it has a low to moderate tendency to expand if disturbed and recompacted (GPI 2022 [Appendix F.5]).

The 2019 geotechnical investigation for the former Women's and Children's Hospital area found bedrock of the Puente Formation at depths from approximately 20 to 40 feet, with materials described as hard siltstone and sandstone exhibiting good strength characteristics but locally fractured. (AECOM 2019 [Appendix F.4]).

GROUNDWATER

The Project Site is in the Central Basin of the Los Angeles Coastal Groundwater Basin. In 2022, groundwater between depths of 25 and 54 feet was encountered across the north side of the Project Site where the Pharmacy Building is located (GPI 2022 [Appendix F.5]). Geotechnologies Inc. confirmed this finding during its exploration of the Project Site in 2025. In 2018 and 2019,

groundwater was encountered at depths from 10 to 18 feet below the ground surface where the Recuperative Care Village is located (Geocon West Inc. 2018, 2019 [Appendices F.2 and F.3)). The 2019 geotechnical investigation prepared by AECOM for the Women's and Children's Hospital Demolition activities observed groundwater conditions generally consistent with the 10- to 20-foot range, with deeper conditions encountered locally in borings advanced up to 81 feet (AECOM 2019 [Appendix F.4]). Historic groundwater monitoring data from wells on adjacent properties to the west, south, and east indicate that groundwater levels ranged from approximately 13 to 44 feet below the ground surface between 2005 and 2013 (Ninyo and Moore 2014).

These groundwater conditions are not, in themselves, considered hazardous and are generally typical for this portion of the Los Angeles Basin. The available information does not indicate flooding conditions, artesian groundwater, or other unusual groundwater conditions that would constitute a geologic hazard. However, groundwater depth is relevant to the geologic hazards analysis because shallow groundwater can increase the potential for liquefaction and other seismic-related ground failure in susceptible soils during strong ground shaking. Groundwater levels may be influenced by seasonal variations, precipitation, irrigation, soil/rock types, groundwater pumping, and other factors and are subject to fluctuations. Shallow perched conditions may also be present.

FAULTING AND SEISMICITY

The Project Site is in a seismically active area, as is the majority of Southern California, and the potential for strong ground motion at the Project Site is considered significant. Figure 3.6-1, *Regional Faults,* shows the approximate Project Site location relative to the principal faults in the region.

Table 3.6.1, *Principal Regional Active Faults*, lists selected principal known active faults within approximately 50 miles of the Project Site and their maximum moment magnitude (M_{max}), as published by the California Geological Survey. The fault distances in Table 3.6.1 are measured from the approximate center of the Project Site (Ninyo & Moore 2014). Blind thrust faults are low-angle faults at depth that do not break the surface and therefore lack a surface trace, but they are capable of generating damaging earthquakes. The nearest blind thrust fault to the Project Site is the Elysian Park blind thrust fault. The Elysian Park fault has been estimated to cause an earthquake every 500 to 1,300 years in the magnitude range of 6.2 to 6.7; the risk of surface rupture potential of buried thrust faults is inferred to be low (Geotechnologies Inc. 2025 [Appendix F.6]).

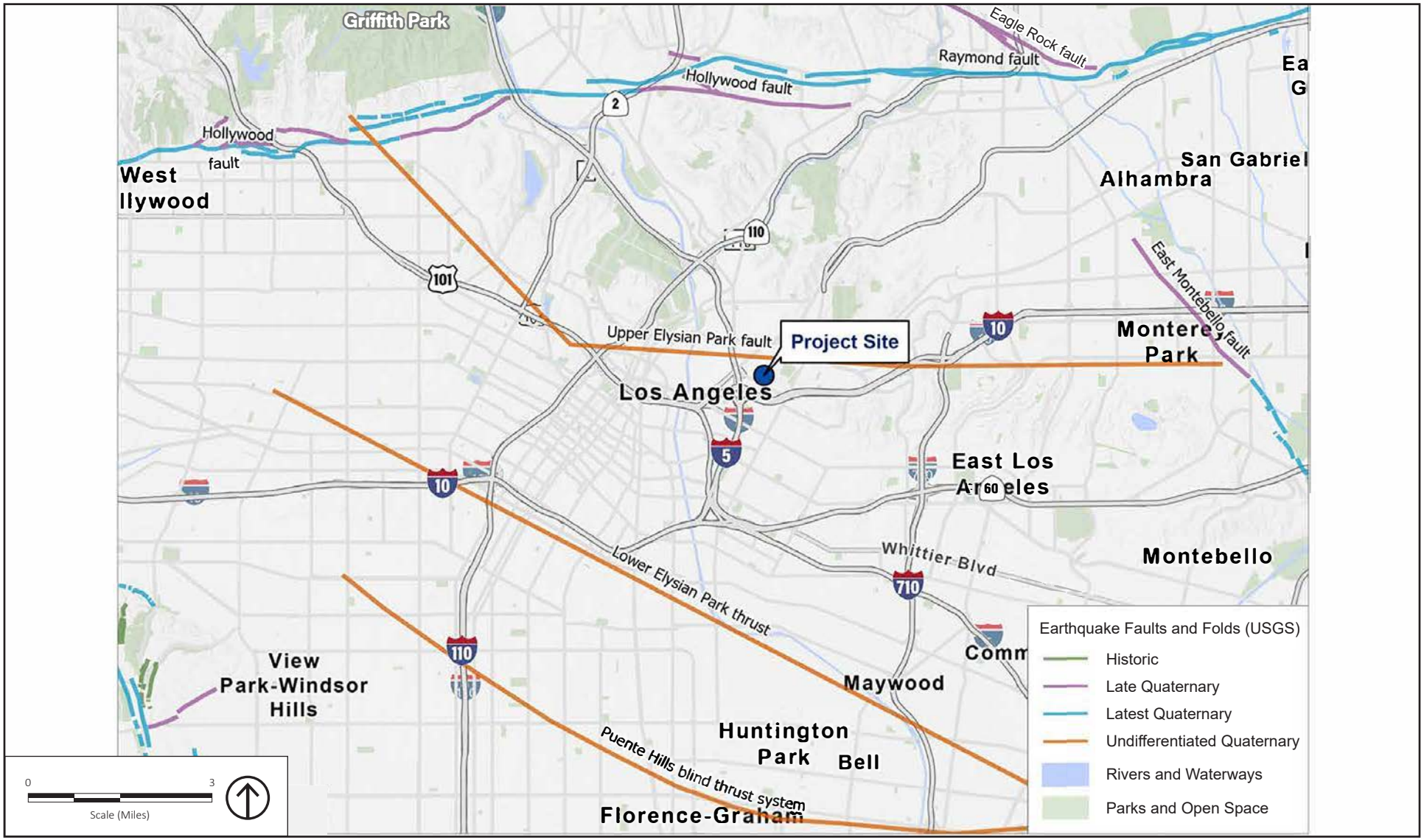
Table 3.6-1 Principal Regional Active Faults

Faults	Approximate Distance to Fault (miles)	Maximum Moment Magnitude (M_{max})
Upper Elysian Park Blind Thrust	0.4	6.4
Raymond	4.2	6.5
Hollywood	4.3	6.4
Puente Hills Blind Thrust	5.6	7.1
Verdugo	5.9	6.9
Newport-Inglewood (Los Angeles Basin)	9.6	7.1
Whittier	10.3	6.8
Sierra Madre	10.4	7.2
Santa Monica	11.6	6.6
Clamshell-Sawpit Canyon	14.6	6.5
Malibu Coast	18.2	6.7
San Gabriel	18.3	7.2
Palos Verdes	18.9	7.3
San Jose	19.0	6.4
Northridge (East Oak Ridge)	19.8	7.0
Anacapa-Dume	19.9	7.5
Santa Susana	24.5	6.7
Chino-Central Avenue (Elsinore)	26.7	6.7
Cucamonga	27.9	6.9
San Joaquin Hills	29.7	6.6

Source: Ninyo & Moore 2014.

As shown in Table 3.6-1, the active Upper Elysian Park blind thrust fault is approximately 0.4 mile north of the approximate center of the Project Site; the active Raymond fault is approximately 4.2 miles north of the approximate center of the Project Site; and the active Hollywood fault is approximately 4.3 miles northwest of the approximate center of the Project Site. The Project Site is not in a State of California Earthquake Fault Zone (Ninyo & Moore 2014).

Figure 3.6-1 - Regional Faults



Source: City of Los Angeles 2025; PlaceWorks 2025.

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Several of the closest and most regionally significant faults, based on their proximity to the Project Site, evidence of Holocene activity, and potential to generate strong ground shaking, are summarized below:

- **Upper Elysian Park Blind Thrust Fault.** Located approximately 0.4 mile from the Project Site, this concealed north-dipping thrust fault underlies central Los Angeles. Although it does not reach the surface, it is considered capable of producing strong ground shaking, with an M_{max} of 6.4 (Ninyo & Moore 2014).
- **Raymond Fault.** Approximately 4.2 miles north of the Project Site, this northwest-trending fault has evidence of Holocene activity and is capable of generating earthquakes up to M_{max} of 6.5. Due to its proximity and activity, it represents one of the key seismic hazards in the Los Angeles Basin (Ninyo & Moore 2014).
- **Hollywood Fault.** About 4.3 miles northwest of the Project Site, the Hollywood fault trends east-west along the base of the Santa Monica Mountains. It is considered active, with evidence of Holocene displacement, and is capable of producing earthquakes with an M_{max} of 6.4 (Ninyo & Moore 2014).
- **Puente Hills Blind Thrust Fault.** Located approximately 5.6 miles from the Project Site, this concealed thrust system underlies much of the Los Angeles Basin. It is one of the region's most significant seismic sources, capable of producing large earthquakes with an M_{max} of 7.1 (Ninyo & Moore 2014).
- **Newport-Inglewood Fault Zone.** Situated about 9.6 miles southwest of the Project Site, this active right-lateral strike-slip fault zone extends through the Los Angeles Basin. It is capable of generating earthquakes with an M_{max} of 7.1 (Ninyo & Moore 2014).
- **San Gabriel Fault.** Approximately 18.3 miles northeast of the Project Site, this northwest-southeast-trending fault extends through the San Gabriel Mountains. About 87 miles in length, it exhibits right-lateral strike-slip movement with Holocene activity and is capable of producing earthquakes with an M_{max} of 7.2 (Ninyo & Moore 2014).

SEISMIC HAZARDS

The primary geologic hazard at the Project Site is the potential for moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. The following discussion addresses the potential for earthquake-induced hazards, including fault rupture, seismic ground shaking, liquefaction, landslides, lateral spreading, subsidence, settlement and collapse, and expansive soils (Geotechnologies Inc. 2025 [Appendix F.6]).

Fault Rupture and Seismic Ground Shaking

Surface rupture is defined as surface displacement that occurs along the surface trace of the causative fault during an earthquake. The predominant seismic hazard for the Project Site is strong ground shaking from regional and local faults, including the Upper Elysian Park fault.

There are no mapped active fault traces cross the Project Site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone. Geotechnical investigations have not identified evidence of historic surface fault rupture at the campus; rather, the primary seismic hazard is strong ground shaking associated with regional blind thrust and strike-slip faults (Ninyo & Moore 2014; AECOM 2019; Geotechnologies Inc. 2025).

The General Hospital Building is classified as a Risk Category III structure The Los Angeles County General Hospital & West Campus Stabilization project was evaluated in a 2025 Addendum to the 2014 Master Plan EIR to address ongoing structural safety, maintenance, and preservation needs associated with the aging historic building. These stabilization activities were approved independently of future adaptive reuse planning and were necessary to reduce seismic risk and maintain the structural integrity of the buildings.

The Proposed Project includes rehabilitation and adaptive reuse of the General Hospital Building, which may involve localized structural modifications to support new occupancy and General Hospital Building use. These modifications would occur within the existing building footprint. The Project Site contains 22 other buildings, most of which are in need of extensive structural repairs. Though most existing buildings on the Project Site were approved for demolition in the 2014 Master Plan EIR due to age, condition, and outdated seismic design, several structures are expected to remain, including the General Hospital Building (undergoing a comprehensive seismic retrofit), Patient's Building (#102), Visitor/Admin Building (#103), and the Telephone Exchange Building (#308). Due to the age of the buildings on the Project Site, many are in disrepair and not constructed to current seismic standards.

Liquefaction

Liquefaction is the phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions, such as those induced by an earthquake (Geotechnologies Inc. 2025). The 2025 geotechnical investigation evaluated liquefaction potential based on borings distributed across the Project Site, and those findings were supplemented by prior geotechnical investigations conducted in adjacent portions of the campus (Ninyo & Moore 2014; Geocon West, Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]).

Ground shaking of sufficient duration results in the loss of grain-to-grain contact because of the rapid rise in pore water pressure, causing the soil to behave as a fluid for a short period of time. Liquefaction is known to occur generally in saturated or nearly saturated cohesionless soils at depths shallower than 50 feet below the ground surface. As discussed under *Groundwater*, depth to groundwater at the Project Site ranges from approximately 13 to 54 feet below ground surface, which is a key factor in evaluating liquefaction potential because shallower groundwater conditions can increase the susceptibility of soils to liquefaction during seismic

events (Ninyo and Moore 2014; GPI 2022 [Appendix F.5]). Factors known to influence liquefaction potential include the composition and thickness of the soil layers, grain size, relative density, the groundwater level, the degree of saturation, and both the intensity and duration of the ground shaking. The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of slabs due to sand boiling, and the buckling of deep foundations due to liquefaction-induced ground settlement.

The 2018 geotechnical investigation for the Recuperative Care Village (RCV) found that soils underlying the RCV portion of the Project Site, which represents a subset of the larger campus, were not susceptible to liquefaction or seismically induced settlement (Geocon West Inc. 2018 [Appendix F.2]). The 2019 geotechnical investigation for the RCV reached similar conclusions, identifying a low risk of liquefaction or related settlement despite shallow groundwater (Geocon West Inc. 2019 [Appendix F.3]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities also concluded that the potential for liquefaction and seismic settlement was negligible (AECOM 2019 [Appendix F.4]). The 2022 geotechnical evaluation prepared for the Pharmacy Building determined that the potential for liquefaction-induced settlement in the area of the Project Site near the Pharmacy Building was negligible (i.e., less than 0.25 inch of movement), and similar negligible potential was identified for seismic densification of near-surface soils (GPI 2022 [Appendix F.5]).

However, an area in the northwestern part of the Project Site lies in a designated Liquefaction Zone (see Figure 3.6-2, *Regional Liquefaction and Landslide Map*) based on regional criteria such as groundwater depth records, soil type, and proximity to active faults. This designation indicates a potential for liquefaction during strong seismic events, rather than a confirmed site-specific hazard (Geotechnologies Inc. 2025 [Appendix F.6]). Properties located within a mapped Liquefaction Zone are subject to site-specific geotechnical investigation and compliance with applicable building code requirements at the time of development. The 2014 Master Plan EIR similarly identified portions of the campus as being within a mapped liquefaction hazard zone based on State mapping.

Landslides and Slope Stability

The significant difference in elevations along State Street separates the Project Site into two different areas. State Street bisects the Campus from south to north, with ground elevations from about 329 feet near Marengo Street, to 333 feet near Zonal Avenue, to 360 feet near the historic courtyard. A series of staircases lead from the courtyard along State Street up to the General Hospital, which is at an average elevation of 385 feet, with the main entry finished floor elevation at 377 feet. The elevation change from the General Hospital to Zonal Avenue ranges from 15 feet to 50 feet, which is offset by a series of loading docks, offices, and vehicle ramps. Continuing west of the General Hospital is another grade change of 17 feet that leads to the Out-Patient Department building drop-off area and Interns and Residents Dorm building. The

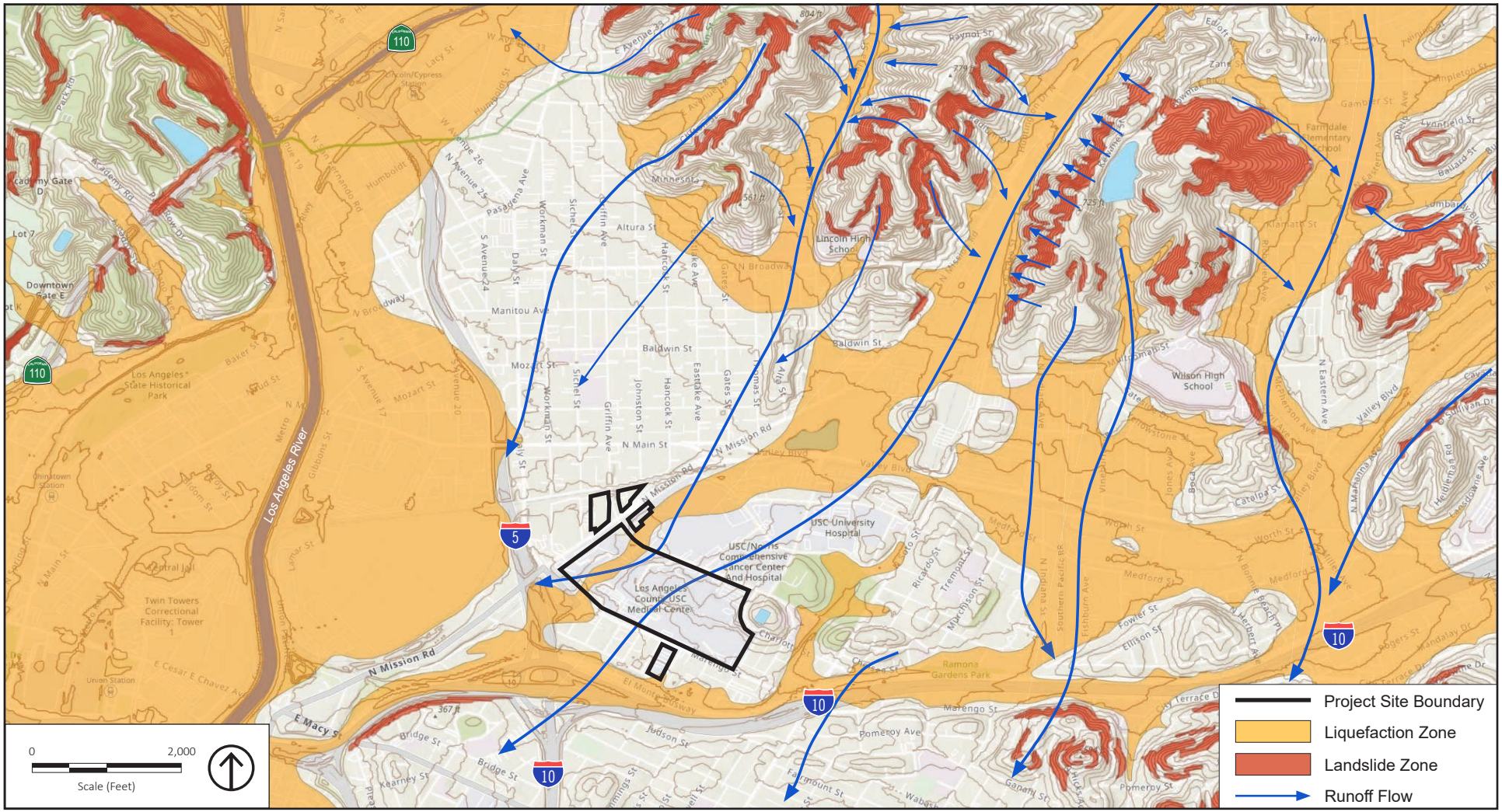
western portion of the Campus lies lower, with the Pharmacy Building and parking structure 10 at approximately 335 feet and the adjacent surface parking lot at approximately 313 feet, forming a low point (Ninyo & Moore 2014; Geocon West Inc. 2019 [Appendix F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]). This low-lying area coincides with the alignment of a historic creek that once conveyed runoff from surrounding hills. These abrupt elevation changes create accessibility challenges and influence how surface water drains across the Project Site.

The Project Site's 40-foot grade difference defines its layout and creates distinct zones—the elevated General Hospital area and the lower West Campus. Approximately 20 percent of the Campus slopes exceed 10 percent.

The 2022 geotechnical investigation prepared for the Pharmacy Building similarly concluded that the on-site surficial soils and engineered fill are generally stable under static and seismic conditions, with no evidence of adverse slope instability or prior slope failures. In addition, the 2018 geotechnical investigation for the RCV area observed stable subsurface conditions without adverse slope hazards. The 2019 geotechnical investigation for the southern site boundary identified the need to evaluate the gross stability of the 40-foot ascending slope in relation to retaining wall design but did not indicate inherent slope failure risks. The 2019 geotechnical investigation for the former Women's and Children's Hospital area confirmed no evidence of existing slope failures within the Campus (Geocon West Inc 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]).

According to the 2025 geotechnical investigation for the Project Site, there were no indications of historical landsliding, and available mapping did not show a landslide on or adjacent to the Project Site. The Project Site and its immediate vicinity are not mapped within an earthquake-induced landslide area, and the probability of seismically induced landslides occurring on the Project Site is considered remote (Geotechnologies Inc. 2025 [Appendix F.6]). The Project Site has been extensively developed and is covered primarily with pavement, hardscape, and structures. The site includes some graded slopes, which are associated with landscaping and pedestrian areas, and the northeast corner of the Project Site contains a slope that ascends approximately 60 feet toward the edge of the Project Site. This slope is landscaped and lined with a series of concrete drainage swales that route runoff away from the slope's face (Ninyo & Moore 2014).

Figure 3.6-2 - Regional Liquefaction and Landslide Map



Source: Centennial Partners 2025.

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According to the 2014 geotechnical investigation for the Project Site, the potential for future landslides or mudflows that could affect development within the Project Site was considered low (Ninyo & Moore 2014), and geologic conditions have not notably changed since that time. The 2018 and 2019 geotechnical investigations for the RCV noted that the 40-foot difference in slope along the southern boundary required evaluation for gross stability but concluded that the Project Site could be safely developed provided that new retaining walls and drainage improvements were incorporated (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities also evaluated slope stability and found no evidence of active or historic slope instability within the demolition footprint (AECOM 2019 [Appendix F.4]).

Regional landslide hazard mapping prepared by the California Geological Survey indicates that the Project Site is not in a designated earthquake-induced landslide zone (see Figure 3.6-2). However, off-site upslope areas located in the surrounding Elysian Park hills are prone to landslides, and slope instability in these areas could contribute sediment erosion that may affect runoff water quality entering and passing through the Project Site (Geocon West, Inc. 2018; 2019 [Appendix F.2 and F.3]).

Lateral Spreading

Lateral spreading is a ground failure phenomenon that can occur when liquefiable soils are present in combination with sloping ground or a free face, such as a river channel or deep excavation. During strong seismic shaking, the buildup of excess pore water pressure can cause saturated soils to lose strength and move laterally downslope, resulting in ground deformation that may damage foundations, utilities, pavements, and retaining structures.

Geotechnical investigations conducted across the Project Site generally concluded that the subsurface soils are not susceptible to widespread liquefaction or lateral spreading (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]; Geotechnologies Inc. 2025 [Appendix F.6]). The 2025 site-specific investigation confirmed that soils in the northwestern portion of the Project Site would not be susceptible to liquefaction under expected seismic ground motions, which correspondingly indicates low risk of lateral spreading in that area (Geotechnologies Inc. 2025 [Appendix F.6]). Though regional mapping places a portion of the Project Site within a designated Liquefaction Zone, this designation reflects conservative criteria rather than confirmed site-specific hazard conditions.

Given the absence of nearby free faces or significant slopes underlain by liquefiable materials, the potential for lateral spreading at the Project Site is considered low. Where undocumented fill or young alluvial soils are present in localized areas, construction practices such as removal and recompaction or replacement with engineered fill would further reduce risks. Therefore, lateral spreading is not anticipated to pose a significant hazard to planned development at the Project Site.

Settlement

Settlement refers to the downward movement of the ground surface caused by the compression of underlying soils in response to applied loads, such as from buildings or other structures or fill. Settlement can be uniform across a site (uniform settlement) or vary in magnitude at different locations (differential settlement). Differential settlement is of greater concern because it can cause cracking or structural damage to buildings, pavements, and utilities. The degree of settlement potential depends on soil type, density, moisture content, and whether the soils have been previously disturbed or compacted. Loose, compressible, or unconsolidated soils, such as alluvium or undocumented fill, tend to be more susceptible to settlement than well-compacted or bedrock materials.

In addition to static settlement hazards, seismically induced settlement can occur where saturated, loose, granular soils densify during strong ground shaking. As discussed in the liquefaction section, portions of the Project Site are underlain by young alluvial deposits and low-lying areas where perched groundwater has historically been observed. In these areas, localized zones of seismic settlement could occur, though site-specific geotechnical investigations have not identified widespread conditions that would lead to large-scale settlement across the Project Site (e.g., Geocon West Inc. 2019 [Appendix F.3]; Geotechnologies Inc. 2025 [Appendix F.6]). Where present, compressible or potentially collapsible soils would be managed through removal, recompaction, or replacement with engineered fill during construction.

SITE SOILS

As described in Section 3.6.1, *Site Geology,* multiple geotechnical investigations confirm that the Project Site is underlain by artificial fill of varying depths, native alluvium, and bedrock of the Puente Formation (Ninyo & Moore 2014; Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]; Geotechnologies Inc. 2025 [Appendix F.6]).

The 2022 geotechnical investigation prepared for the Pharmacy Building characterized subsurface soils as predominantly sandy, coarse-grained materials with localized silty clays and clayey silts. These results confirm that while much of the Project Site is underlain by relatively erodible sandy soils, some areas contain cohesive silty clay that may reduce erodibility but contribute to differential expansion when moisture levels vary (GPI 2022 [Appendix F.5]).

Additional investigations have further documented soil conditions across the Project Site. The 2018 geotechnical investigation (RCV area) encountered artificial fill consisting of loose silty sand with gravel, underlain by silty sand and sandy silt alluvium and Puente Formation bedrock (Geocon West Inc 2018 [Appendix F.2]). The 2019 geotechnical investigation (southern Project Site boundary) identified artificial fill to depths of approximately 10 feet, underlain by colluvium (firm to stiff clay and silt), alluvium, and weathered Puente Formation siltstone and sandstone,

noting that colluvial soils may be more susceptible to creep (Geocon West Inc 2019 [Appendix F.3]). The 2019 geotechnical investigation (former Women's and Children's Hospital area) confirmed similar subsurface conditions of fill, alluvium, and bedrock, and noted variable soil behavior including localized expansive or collapsible characteristics (AECOM 2019 [Appendix F.4]).

Overall, the findings of these investigations demonstrate consistent soil conditions across the Project Site, with artificial fill of varying depths overlying alluvium and Puente Formation bedrock. These materials exhibit a range of engineering characteristics, including erodible sandy soils, clayey soils with expansion potential, and colluvial soils prone to creep (Ninyo & Moore 2014; Geocon West Inc 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]).

Subsidence

Subsidence is characterized as a sinking of the ground surface relative to surrounding areas. It generally occurs where deep soil deposits are present. Subsidence in such areas is typically associated with regional withdrawals of groundwater or other withdrawals, such as oil and natural gas. Subsidence can result in the development of ground cracks and damage to subsurface vaults, pipelines, and other improvements.

Mapped areas of subsidence were not found in the City or County of Los Angeles reference materials. Applicable County regulations and policies address geologic hazards, including subsidence, and include requirements to minimize risks associated with unstable soils and ground conditions. Subsurface extraction activities in the city are regulated by Oil Drilling District procedures, which contain provisions for monitoring and imposing measures to preclude subsidence related to oil and gas extraction.

According to the 2014 preliminary geotechnical evaluation, no evidence of regional subsidence hazards was identified within the Project Site, though young unconsolidated alluvial deposits were noted to have potential for settlement if not properly engineered (Ninyo and Moore 2014). Similarly, the 2018 geotechnical investigation for the RCV did not identify evidence of subsidence but noted the presence of undocumented fill and loose near-surface soils that could undergo localized settlement when subjected to new loads or wetting (Geocon West Inc. 2018 [Appendix F.2]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities reported that natural alluvial soils in that portion of the Campus were medium dense to very dense and not susceptible to regional subsidence, though localized differential settlement could occur in undocumented fill (AECOM 2019 [Appendix F.4]). The 2022 geotechnical evaluation for the Pharmacy Building confirmed these findings and reported no evidence of regional subsidence, ground lurching, or shallow ground rupture at the Project Site. Analyses of seismic-induced densification indicated negligible settlement (less than 0.25

inch), suggesting that the risk of damaging subsidence at the Project Site is relatively low (GPI 2022 [Appendix F.5]).

Compressible/Collapsible Soils

Compressible soils undergo consolidation when exposed to new loading, such as fill or foundation loads. Soil collapse is a phenomenon in which the soils undergo a significant decrease in volume when exposed to an increase in moisture content, with or without an increase in external loads. Buildings, structures, and other improvements may be subject to excessive settlement-related distress when compressible soils or collapsible soils are present.

Given their young nature, the alluvial deposits under the Project Site are generally unconsolidated, reflecting a depositional history without substantial loading, and may be subject to collapse. Older undocumented fill soils are considered potentially compressible/collapsible (Ninyo and Moore 2014).

The 2018 geotechnical investigation for the RCV identified undocumented fill containing loose to medium dense silty sands and clays overlying native alluvium. These near-surface soils were characterized as variable and susceptible to settlement or collapse when exposed to added loads or wetting. Deeper native soils, however, were generally dense sands and stiff clays with low compressibility potential (Geocon West Inc. 2018 [Appendix F.2]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities also observed undocumented fill with construction debris and variable density overlying medium dense to very dense native soils. While localized compressibility was noted in surficial soils, the investigation concluded that natural alluvium and Puente Formation bedrock at depth provided adequate bearing strength with low collapse potential (AECOM 2019 [Appendix F.4]).

The 2022 geotechnical investigation prepared for the Pharmacy Building also confirmed undocumented fill up to 10 feet thick on the north side of the Pharmacy Building and up to 18 feet thick on the south side, consisting of silty sands, clays, and construction debris. These fill materials were identified as variable in density and moisture content, with a potential for compressibility or collapse under added load or wetting. Below the fill, natural alluvial soils were generally firm to very dense, and Puente Formation bedrock was dense to very dense, indicating low compressibility potential at depth (GPI 2022 [Appendix F.5]).

Expansive Soils

Expansive soils include clay minerals, which are characterized by their ability to undergo significant volume change (shrink or swell) in response to variations in moisture content. Sandy soils are generally not expansive. Changes in soil moisture content can result from rainfall, irrigation, pipeline leakage, surface drainage, perched groundwater, drought, or other factors. A volumetric change in expansive soils may cause excessive cracking and heaving of structures

with shallow foundations, concrete slabs on grade, or pavement that was supported on such material.

According to the 2014 preliminary geotechnical evaluation prepared for the 2014 Master Plan, the near-surface soils at the Project Site are composed predominantly of sandy, coarse-grained materials, which are not anticipated to have changed since that time. These soils typically have a low expansion potential (Ninyo and Moore 2014).

The 2018 geotechnical investigation for the RCV identified near-surface silty clays and clayey sands with plasticity and expansion indices corresponding to low-to-moderate expansion potential. These soils were considered suitable for support of proposed improvements with appropriate moisture conditioning and control during construction (Geocon West Inc. 2018 [Appendix F.2]).

The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities reported clayey soils in the upper subsurface that also exhibited low to moderate plasticity and expansion indices. The report concluded that expansive soil conditions at that portion of the Project Site could be adequately addressed through standard geotechnical design practices, including moisture conditioning and foundation design adjustments (AECOM 2019 [Appendix F.4]).

The 2022 geotechnical investigation for the Pharmacy Building confirmed this characterization and reported laboratory testing of on-site silty clays and clayey silts, with expansion indices ranging from 11 to 23 and plasticity indices of 15 to 17, indicating a low to moderate expansion potential. The report also identified that the underlying Puente Formation siltstone and sandstone bedrock may exhibit expansion if disturbed (GPI 2022 [Appendix F.5]).

In 2025, Geotechnologies Inc. conducted a review of the expansion index observed from representative soil samples. The on-site geologic materials were determined to have a moderate to high expansion. The expansion index was found to be between 50 and 99 for bulk samples of the on-site soils (Geotechnologies Inc. 2025 [Appendix F.6]).

Corrosive Soils

According to the 2014 geotechnical investigation, the geologic environment of the Project Site could include soil conditions that would be corrosive to concrete and metals. Corrosive soil may exacerbate corrosion hazards for buried conduits, foundations, and other buried concrete or metal improvements. Corrosive soil could cause premature deterioration of these underground structures or foundations (Ninyo & Moore 2014). Subsequent investigations across the Project Site documented variable sulfate and chloride concentrations in soils as well as electrical resistivity values that indicate corrosive potential (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; GPI 2022 [Appendix F.5]). These conditions demonstrate that portions of the Project Site contain soils capable of chemically attacking conventional concrete and buried metals,

which could compromise the durability of foundations and underground utilities if not properly addressed (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; GPI 2022 [Appendix F.5]).

PALEONTOLOGICAL RESOURCES

The Project Site is underlain by older Quaternary alluvial deposits and, at depth, the Miocene-age Puente Formation, both of which are considered paleontologically sensitive and have yielded significant fossils in the Los Angeles Basin (County of Los Angeles 2014). According to the University of California Museum of Paleontology Specimen Search, several fossil localities are in the City of Los Angeles (UCMP 2025).

A review of the fossil records database maintained by the Natural History Museum of Los Angeles County (NHMLAC) identified negative results within the Project Site and seven fossil localities within approximately one mile of the Project Site (Envicom 2026 [Appendix E.1]).

Envicom examined the T.W. Dibblee and H.E. Ehrenspeck Geologic Map of the Los Angeles Quadrangle, Los Angeles County, California, which shows that four different geologies underly the Project Site: 'Qa,' 'Qoa,' 'Tush,' and 'Tuss.' 'Qa,' which spans most of the Project Site, is floodplain sediment that dates to the Holocene (modern) era; this geological rock unit is not usually paleontologically sensitive. However, modern alluvial soil depth often is highly variable, and this material normally covers older, more sensitive. 'Tuss,' the second most common geological rock unit located on the Project Site, is an unknown shale formation that dates to the Miocene. It is characterized by "light gray to tan semi-friable sandstone, with thin interbeds of silty shale." This geological rock unit occurs in the center and northeast portion of the Project Site, and may be paleontologically sensitive. 'Tush' geology is a similar Miocene shale formation that runs along the northern edge of the Project Site. It also has the potential to be paleontologically sensitive due to its age. The final geology type, 'Qoa,' represents older alluvial sediments that date to the Pleistocene, which is sensitive for terrestrial fossil material. According to the geologic map, 'Qoa' only occurs on the far southwest corner of the Project Site; however, this older material most likely is also located below the modern alluvial (Qa) soils in parts of the Project Site. The nearby fossil resources listed by the NHMLAC were Pleistocene in origin (Envicom 2026 [Appendix E.1]).

3.6.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to geology and soils if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)

   ii) Strong seismic ground shaking.

   iii) Seismic-related ground failure, including liquefaction.

   iv) Landslides.

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

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

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

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

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

METHODOLOGY

Because geology, soils, and paleontological resources are location-specific and tied to site conditions, the study area for the Proposed Project's analysis consists primarily of the Project Site and areas immediately adjacent to it that could be affected by ground disturbance, grading, excavation, or site preparation activities. For seismic hazards, including ground shaking, liquefaction, and fault rupture, the study area also considers regional fault systems within the Los Angeles Basin that could generate ground motion affecting the Project Site. For paleontological resources, the study area is limited to the Project Site where excavation could extend into native geologic units.

Geology and Soils

The analysis of geology and soils impacts in this section is based on a review of existing site conditions, geotechnical studies, and applicable regulatory requirements, including the California Building Code and County of Los Angeles standards that might be affected by the Proposed Project. Key considerations include seismic hazards (fault rupture, strong ground shaking, liquefaction, and landslides), soil stability (including expansive and corrosive soils), and erosion potential during construction and operation. The evaluation follows the requirements of CEQA and the State CEQA Guidelines and applicable local policies, and is informed by industry standards for geotechnical and seismic hazard assessment. Impacts are assessed using established significance thresholds to determine whether the Proposed Project would expose people or structures to substantial adverse effects related to geologic or soil conditions.

Paleontological Resources

The Potential Fossil Yield Classification (PFYC) system[3], a multilevel ranking system was developed by professional resource managers as a practical tool for evaluating the potential for paleontological resources. With the PFYC system, geologic units are classified according to the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts. This ranking is not intended to be applied to specific paleontological localities or small areas within units. Although significant localities may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher PFYC value; instead, the relative abundance of localities is intended to be the major determinant for the value assignment. The system has five numbered scores, from 1 to 5, but score 3 is subdivided into a and b. For this analysis, the PFYC system was applied to the geologic units underlying the Project Site to evaluate their paleontological sensitivity and to inform the impact analysis and mitigation recommendations presented in this Draft SEIR.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

This Subsequent EIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the

[3] The Potential Fossil Yield Classification (PFYC) system was developed by the U.S. Department of the Interior, Bureau of Land Management (BLM) as a standardized tool for assessing the paleontological sensitivity of geologic units for land use planning and environmental review (BLM 2016, Instruction Memorandum No. 2016-124, Potential Fossil Yield Classification System). Under the PFYC system, sensitivity rankings are applied to geologic formations or mapping units rather than to individual fossil discoveries. A “specific paleontological locality” refers to a discrete geographic site or stratigraphic exposure where scientifically significant fossil material has been documented and recorded, typically with precise locational and stratigraphic data.

2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Section 3.6.4, *Project Impact Analysis*, and 3.6.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant geology and soils impacts with implementation of standard design measures and mitigation related to seismic hazards, liquefaction, groundwater, collapsible soils, expansive soils, corrosive soils, soil erosion, and paleontological resources. Paleontological resources were addressed in the Cultural Resources section of the 2014 Master Plan EIR rather than in Geology and Soils. The significance thresholds in Appendix G of the State CEQA Guidelines were revised in 2018, and the paleontological resource threshold question was moved from the Cultural Resources to Geology and Soils section. As a result, this Draft SEIR addresses paleontological resources in this section for consistency with the current State CEQA Guidelines. Table 3.6-2, *Summary of the 2014 Master Plan EIR Geology and Soils Impact Conclusions*, provides an overview of previous geology and soils impact analyses for the Campus.

Table 3.6-2 Summary of the 2014 Master Plan EIR Geology and Soils Impact Conclusions

Significance Criteria [1]	Significance without Mitigation	Mitigation Measure [2]	Significance with Mitigation
GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction. iv) Landslides.	Potentially Significant (construction and operation)	MM-GEO-1	Less Than Significant
GEO-2: Result in substantial soil erosion or the loss of topsoil.	Potentially Significant (construction) Less Than Significant (operation)	MM-GEO-2	Less than Significant

Table 3.6-2 Summary of the 2014 Master Plan EIR Geology and Soils Impact Conclusions

Significance Criteria [1]	Significance without Mitigation	Mitigation Measure [2]	Significance with Mitigation
GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	Potentially Significant (construction and operation)	MM-GEO-1	Less Than Significant
GEO-4: Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Potentially Significant (construction and operation)	MM-GEO-1	Less Than Significant
GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	The lead agency determined in the 2014 NOP/IS, released in May 2014, that the 2014 Master Plan would result in no impacts in the following area and was therefore screened from further review in the 2014 Master Plan EIR.		
CR-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially significant (construction and operation)	MM-CR-9	Less than significant

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this Draft SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures in the 2014 Master Plan EIR.

3.6.4 Project Impact Analysis

a) Would the project subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, including the risk of loss, injury, or death involving:
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
ii) Strong seismic ground shaking.
iii) Seismic-related ground failure, including liquefaction.
iv) Landslides.

Construction

Fault Rupture

As shown in Figure 3.6-1, the Project Site is not transected by known active or potentially active faults and is not located within an Alquist-Priolo Fault Zone. Therefore, the potential for surface rupture at the Project Site is considered low (Geotechnologies Inc. 2025 [Appendix F.6]).

As previously identified, the active Upper Elysian Park blind thrust fault is approximately 0.4 mile north of the approximate center of the Project Site. As previously discussed, buried thrust faults are faults without a surface expression. The risk for surface rupture potential of buried thrust faults is inferred to be low (Geotechnologies Inc. 2025 [Appendix F.6]).

Although the potential for surface fault rupture is relatively low, surface fault rupture is one of the most destructive seismic hazards because it can result in permanent ground displacement of several feet to more than 10 feet during strong earthquakes (magnitude 6.5 to 7.5). Structures and utilities located across a fault trace are most at risk, which is why the Alquist-Priolo Earthquake Fault Zoning Act prohibits human-occupied structures within 50 feet of an active fault trace. Historical events in Southern California, such as the 1971 San Fernando Earthquake (magnitude 6.6), produced surface displacements of up to 6 feet and caused severe structural damage to hospitals and residences near the fault.

Construction activities would involve demolition, grading, excavation, and trenching for utilities and foundations. Although no active fault is mapped across the Project Site, the site is located within 10 to 20 miles of several active and potentially active faults capable of generating strong seismic events. During a strong earthquake, secondary effects such as lurching, cracking, and differential settlement could occur and affect open excavations, partially completed structures, and underground utilities. Even where a site is not directly crossed by a fault, these secondary effects can occur within 10 to 20 miles of the causative fault, posing risks during construction. Therefore, this impact is potentially **significant**.

Seismic Ground Shaking

Because the Project Site is in a seismically active region, the potential exists for seismic ground shaking. However, the level of ground shaking at a given location depends on many factors, including the size and type of earthquake, the distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking.

As discussed in Chapter 2, *Project Description*, of this Draft SEIR, most of the existing buildings within the Project Site are planned for demolition. The General Hospital Building, Patient's Building (#102), Visitor/Admin Building (#103), and the Telephone Exchange Building (#308)

would remain. As part of the Proposed Project, the General Hospital Building would be adaptively reused.

The General Hospital requires seismic retrofitting (approved as part of the 2025 Addendum to the 2014 Master Plan EIR) to ensure the structure maintains life safety standards following a major earthquake. Upgrades are expected to include structural reinforcement, foundation improvements, and utility resilience. Localized slope conditions can exacerbate shaking-related instability, particularly if slopes are undercut or inadequately stabilized during construction. However, multiple site-specific geotechnical investigations (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]) have consistently found surficial soils and engineered fill within the Project Site to be stable under static and seismic conditions.

Construction activities would involve demolition of existing buildings, grading, excavation, and construction of new improvements. Strong seismic ground shaking during construction could result in slope instability, ground cracking, differential settlement, or damage to partially completed structures and temporary facilities. Retained buildings that have not yet undergone seismic retrofitting may also be vulnerable to damage if a major seismic event occurs during construction. Although geotechnical investigations have found on-site soils to be stable under seismic conditions, the Project Site remains subject to regional ground shaking hazards. Therefore, this impact could be potentially **significant**.

Liquefaction

Construction activities would involve grading, excavation, and foundation preparation within areas mapped as potentially susceptible to liquefaction. Although site-specific investigations indicate that liquefaction-induced settlement is negligible at tested locations, portions of the Project Site contain young alluvial soils and shallow groundwater, which are conditions generally associated with liquefaction susceptibility. During a strong seismic event, liquefaction or localized lateral spreading could result in ground settlement, instability of temporary excavations, and damage to partially completed improvements. Therefore, this impact could be potentially **significant**.

Landslides

The Proposed Project could include slope modification to address topographic grade shifts on the Campus in order to improve accessibility. While this sloped condition is present on-site, it is an entirely isolated feature, not connected to large slope or mountainous conditions and, no mapped landslides are present on or adjacent to the Project Site. Geotechnical investigations have identified stable slope conditions, the potential for construction-related landslides or seismically induced slope failure is considered low. In addition, any construction activities associated with future development activities would undertake geological evaluations to

determine location-specific conditions and make site-specific design recommendations. Therefore, this impact would be **less than significant**.

Operation

Fault Rupture

Operation of the Proposed Project would involve occupancy of new and retained structures and use of site infrastructure. Although the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, strong seismic events on nearby faults could result in secondary ground deformation, including lurching, cracking, and differential settlement. Even where a site is not directly crossed by a fault, these secondary effects can occur within 10 to 20 miles of the causative fault, posing risks to buildings and residents. Therefore, this impact could be potentially **significant**.

Seismic Ground Shaking

Operation of the Proposed Project would involve occupancy of retained and newly constructed buildings. Buildings not designed or retrofitted to current seismic standards could experience structural damage during strong ground shaking. The General Hospital Building is undergoing seismic retrofitting to improve post-earthquake performance; however, prior to implementation of site-specific design measures for future improvements, strong seismic ground shaking represents a potentially **significant** impact.

Liquefaction

As shown in Figure 3.6-2, a State-designated liquefaction hazard zone traverses the northwestern portion of the Project Site. Geotechnologies Inc. conducted a Liquefaction Evaluation for the liquefiable area of the Project Site. The results of the evaluation determined that the soils within the northwestern portion of the Project Site would not be susceptible to liquefaction during the ground motion expected during a seismic event (Geotechnologies Inc. 2025). The previously conducted site-specific geotechnical investigations have consistently concluded that liquefaction-induced settlement at tested locations throughout the Project Site is negligible.

The 2022 geotechnical investigation for the Pharmacy building found settlement to be less than 0.25 inch (GPI 2022 [Appendix F.5]). The 2018 and 2019 geotechnical investigations for the RCV identified low risk of liquefaction or related seismic settlement, even with shallow groundwater (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities also determined that liquefaction and seismic settlement potential was negligible (AECOM 2019 [Appendix F.4]). These findings demonstrate that, although the Project Site is mapped within a liquefaction hazard zone,

localized soil conditions generally limit the hazard to a low level. In addition, where slopes intersect low-lying alluvial areas, localized risks of lateral movement could occur during liquefaction. Geotechnical investigations for the southern slope of the Campus concluded that safe development would be feasible with retaining wall and drainage improvements, ensuring gross slope stability even under seismic conditions (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]).

Operation of the Proposed Project would involve occupancy of new and retained structures within areas mapped as a liquefaction hazard zone. Although multiple geotechnical investigations have concluded that liquefaction-induced settlement is negligible at evaluated locations, the presence of young alluvial deposits and shallow groundwater indicates that some potential for liquefaction exists under extreme seismic loading conditions. Liquefaction-related settlement or lateral movement could damage foundations, pavements, and underground utilities if not properly addressed through site-specific design measures. Therefore, this impact could be potentially **significant**.

Landslides

Geotechnologies Inc.'s 2025 site investigation did not identify any indications of landsliding. Available mapping did not show a landslide on or adjacent to the Project Site, and the Project Site and its immediate vicinity are not mapped within an earthquake-induced landside area (Geotechnologies Inc. 2025 [Appendix F.6]). The probability of seismically induced landslides on the Project Site is considered remote (Geotechnologies Inc. 2025 [Appendix F.6]).

The 2018 geotechnical investigation for the RCV encountered stable alluvium and Puente Formation bedrock and did not identify adverse slope stability conditions (Geocon West Inc 2018 [Appendix F.2]). The 2019 geotechnical investigation similarly concluded that the gross stability of the existing 40-foot ascending slope bounding the southern portion of the Project Site would require evaluation for retaining wall design but did not indicate an inherent risk of large-scale slope failure (Geocon West Inc 2019 [Appendix F.3]). The 2019 geotechnical investigation for the Women's and Children's Hospital Demolition activities further evaluated interim and permanent slope stability and found no evidence of existing landslides or slope failures within the Project Site (AECOM 2019 [Appendix F.4]).

Operation of the Proposed Project would not introduce new unstable slope conditions and would instead improve topographic conditions at the Project Site by reducing steep slope conditions. Retaining walls and drainage improvements would be designed in accordance with site-specific geotechnical recommendations to ensure long-term stability. Because no existing landslides are mapped within or adjacent to the Project Site and the probability of seismically induced landslides is considered remote, operation of the Proposed Project would not expose people or structures to substantial adverse effects related to landslides. Therefore, this impact would be **less than significant**.

Summary

As described above, the Proposed Project would have the potential to result in **significant** impacts associated with fault rupture, seismic ground shaking, liquefaction, and slope stability. The following mitigation measure is applicable to the impacts identified as significant in this section.

Impact GEO-1: The Proposed Project could expose people or structures to potentially significant adverse effects related to surface fault rupture, strong seismic ground shaking, liquefaction, and slope stability.

Mitigation Measure GEO-1: Prior to any structural improvements to buildings or prior to any excavation related to the construction of new facilities, detailed subsurface geotechnical evaluations shall be performed to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction. The Project Applicant(s) or its designee shall ensure that all recommendations contained in the approved geotechnical reports are incorporated into final design plans and implemented during construction. All recommendations shall be implemented.

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

- **Seismicity**: Structural elements of future improvements shall be designed to resist or accommodate appropriate site-specific ground motions and conform to the current seismic design standards.
- **Liquefaction**: An assessment of the liquefaction potential shall be made prior to detailed design and construction of project improvements. Structural design and preventative techniques, such as *in situ* ground modification or supporting foundations with piles at depths designed specifically for liquefaction, shall be included.

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

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

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

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

- **Groundwater**: Excavations for foundations in areas with shallow perched groundwater may need to be cased/shored and/or dewatered to maintain stability of the excavations and provide access for construction. All recommendations included in the preliminary geotechnical evaluations pertaining to groundwater shall be followed.

  Excavations for underground structures shall be performed with care to reduce the potential for lateral deflection of excavation sidewalls and/or shoring, which may also cause differential movement of structures located near the excavation.

  Further study, including subsurface exploration, shall be performed during the detailed design phase of future improvements to evaluate the presence of groundwater, seepage, and/or perched groundwater at the Project Site and the potential impacts on design and construction of project improvements. An assessment of the potential for shallow groundwater shall be made during the design phase of each project, and design techniques shall be developed as necessary.

- **Collapsible Soils/Settlement:** An assessment of the potential for soils that are prone to settlement shall be made prior to detailed design and construction of project improvements, and design techniques shall be developed, as appropriate, to reduce impacts related to settlement to low levels.

During the detailed design phase of the project, surface reconnaissance and site-specific geotechnical evaluations shall be performed to assess the settlement potential of the on-site natural soils and undocumented fill. This may include detailed surface reconnaissance to evaluate site conditions, drilling of exploratory borings or test pits, and laboratory testing of soils, where appropriate, to evaluate site conditions.

Prescribed approaches to address potential soil settlement could include either removal of the compressible/collapsible soil layers and replacement with compacted fill, surcharging to induce settlement prior to construction of improvements, allowing for a settlement period after or during construction with new fills, or a specialized foundation design, including the use of deep foundation systems to support structures. Varieties of *in situ* soil improvement techniques are also available, such as dynamic compaction (heavy tamping) or compaction grouting.

The geotechnical evaluation(s) shall include the following measures to address and resolve site-specific expansive and corrosive soils hazards:

- **Expansive Soils:** Mitigation techniques to reduce expansive soil potential shall be included as necessary. Techniques shall include overexcavation and replacement with non-expansive soil, soil treatment, moisture management, and/or a specific structural design for expansive soil conditions developed during the design phase.
- **Corrosive Soils:** An assessment of the potential for corrosive soils shall be made during the detailed design phase of the project through soil testing procedures. Engineering methods shall be developed, as appropriate, to reduce impacts related to corrosive soils to low levels. Subsurface evaluation, including laboratory testing, shall be performed. Evaluation of the corrosive soil potential shall be accomplished through testing and analysis of soils at foundation design depths. The laboratory tests conducted on the soils prior to construction and improvement plan preparation shall include corrosivity tests. Review of these data by a corrosion engineer, if determined necessary in the geotechnical evaluation, shall result in corrosion protection measures that address site-specific conditions. Evaluation of the potential corrosive soils hazard shall be performed prior to detailed design and construction so that, in the event the hazard exists, engineering methods may be implemented. To avoid site-specific subsurface evaluation, corrosion protection measures may be included in the initial design for the proposed project improvements.

Depending on site-specific conditions presented geotechnical evaluation, recommendations for corrosive soil conditions may involve the use of concrete that is

resistant to sulfate exposure. Corrosion protection for metals may be needed for underground foundations or structures in areas where corrosive groundwater or soil could cause deterioration. Typical design techniques include epoxy and metallic protective coatings, the use of alternative (corrosion-resistant) materials, and selection of the appropriate type of cement and water/cement ratio.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure GEO-1, which requires detailed site-specific geotechnical investigations and incorporation of design recommendations, would reduce these impacts to less than significant levels. This mitigation measure addresses the full range of seismic hazards evaluated for the Proposed Project, including the potential for surface fault rupture, strong ground shaking, liquefaction, and slope instability. Detailed design-level geotechnical studies would confirm site conditions and provide engineering recommendations, such as structural reinforcement, foundation design, ground improvement, or slope stabilization where necessary. Adherence to the regulatory requirements and implementation of recommendations in the project-specific geotechnical reports would ensure that the risk of damage from liquefaction and seismic settlement is minimized. Therefore, the Proposed Project's potential for fault rupture, ground shaking, liquefaction, and slope stability hazards would be less than significant under both construction and operational conditions with the implementation of Mitigation Measure GEO-1.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Construction

According to the 2014 preliminary geotechnical evaluation, the materials exposed at the surface of the Project Site include silty clay and silty to clayey sand soils as well as interbedded sandstone and shale rock. Geologic conditions have not changed significantly since that time. Sandy soils typically have low cohesion and a relatively higher potential for erosion from surface runoff when exposed in cut slopes or utilized near the face of fill embankments. Surface soils with higher amounts of clay tend to be less erodible because the clay acts as a binder that holds the soil particles together. Future development and activities at the Project Site would result in ground surface disruption during excavation, grading, and trenching. The grading strategy for the Proposed Project would be designed to closely balance the tiered grades of the existing topography, accommodate the needs of the proposed building program, and provide improved circulation and ADA access throughout the Project Site. The Proposed Project includes site grading using excavated fill to reduce slopes along primary streets to less than five percent. Construction activities would create the potential for erosion. Erosion control is considered a site constraint, particularly for landscaped slopes at the Campus periphery and the low-lying areas near the historic creek alignment.

As described in Chapter 3.8, *Hydrology and Water Quality*, of this Draft SEIR, any project involving grading of an area greater than one acre is required to apply for an NPDES permit from

the Los Angeles Regional Water Quality Control Board. This permit requires preparation and implementation of a SWPPP that incorporates BMPs for erosion control. Because future construction activities to implement the Proposed Project would result in a land disturbance of one acre or more, the Proposed Project must comply with the requirements of the NPDES permit, specifically, the implementation of a SWPPP. In addition to regulatory requirements, previous geotechnical investigations conducted on the Project Site have identified erosion as a site constraint in localized areas, particularly along landscaped slopes and the historic creek alignment, and provided detailed recommendations for grading methods, slope stabilization, and temporary shoring (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]). These recommendations include limiting the steepness of cut slopes in sandy soils, incorporating erosion-control matting and revegetation on disturbed areas, and directing surface drainage away from exposed soil faces. Implementation of these site-specific measures, combined with BMPs identified in the SWPPP (e.g., silt fences, fiber rolls, stabilized construction entrances), would substantially reduce the potential for erosion and sediment transport. Further, compliance with the CBC and the Los Angeles County Building Code and incorporation of site-specific geotechnical recommendations would further reduce erosion risks associated with cut slopes and temporary excavations. Therefore, the Proposed Project's potential for soil erosion related to construction would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Proposed Project's operational conditions would account for the steep grade changes along State Street and the northeast slope, where unmanaged runoff could exacerbate erosion. Incorporating engineered drainage, energy dissipators, and landscaped stabilization in these areas would address this constraint and maintain soil stability over time. Additionally, during long-term operation of proposed developments and improvements at the Project Site, provisions for surface drainage and incorporation of appropriate BMPs (filtration, runoff-minimizing landscaping for common areas, energy dissipators, inlet trash racks, and water quality inlets) would reduce the potential for soil erosion at the Project Site. Proposed stormwater management would also include LID features such as bioretention basins, vegetated swales, and wetland/detention areas designed to capture and infiltrate stormwater at the source. These features slow runoff, promote infiltration, and filter sediments before water is released into the storm drain system, thereby reducing the potential for soil erosion and loss of topsoil during operation (SWRCB 2017). Routine maintenance of these BMPs and LID features would be conducted as part of the project's operational conditions to ensure their long-term effectiveness. Consistent with County's LID Standards Manual and County Code Title 12, Chapter 84, the Proposed Project would be required to prepare and implement an LID Plan demonstrating compliance with County requirements for infiltration-based BMPs. The LID Plan would specifically identify the location, sizing, and design standards for bioretention areas, swales, and other infiltration-based features, ensuring that stormwater is managed on-site in a

manner that prevents significant operational impacts related to soil erosion or loss of topsoil. Therefore, impacts related to operation of the project would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Liquefaction and Landslides

Potential impacts related to liquefaction and landslides are addressed under impact discussion (a).

Subsidence

As previously stated, mapped areas of subsidence were not found in the City or County of Los Angeles reference materials. Therefore, the potential for subsidence on the Project Site is relatively low.

Construction

Construction of the Proposed Project would involve demolition, grading, excavation for foundations and utilities, modification/improvements to existing buildings, and construction of new buildings. Previous geotechnical investigations on the Project Site have not identified conditions conducive to regional ground subsidence, such as hydrocompaction from groundwater withdrawal or settlement related to hydrocarbon extraction (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]). The Proposed Project is not expected to require substantial groundwater pumping or other activities that could trigger subsidence. Accordingly, the potential for construction-related subsidence is low. Therefore, impacts would be **less than significant**.

Operation

During operation, structural loads associated with new and retained development would be addressed through standard foundation design in accordance with the California Building Code and Los Angeles County Building Code requirements. No ongoing groundwater withdrawal or subsurface resource extraction is proposed that would contribute to regional subsidence. Therefore, the potential for operational subsidence impacts is low. Impacts would be **less than significant**.

Groundwater

Groundwater beneath the Project Site has been encountered historically at depths from approximately 10 to over 50 feet below ground surface, with the shallowest observed level at approximately 10 feet below ground surface and fluctuations generally reported in the 20-foot range (Ninyo & Moore 1995; Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]; Geotechnologies Inc. 2025 [Appendix F.6]). Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors not evident at the time measurements were reported by Geotechnologies Inc. Fluctuations also may occur across the Project Site. High groundwater levels can result in changed conditions (Geotechnologies Inc. 2025 [Appendix F.6]). These investigations confirm that groundwater conditions are variable across the Project Site, and perched water may be present in localized areas.

Construction

Proposed construction activities would include excavation and site grading for new medical, office, and retail structures; pedestrian areas; landscaping; open space areas; and parking area improvements. Given the described groundwater conditions and the anticipated excavation depths, which have a maximum depth of 35 feet below existing grade in certain locations, groundwater could be encountered during construction (Sherwood Design Engineers 2025). Wet or saturated soils within excavations may cause instability, require shoring, or necessitate localized dewatering. Dewatering could involve temporary pumping from excavations or installation of well points to lower perched groundwater in shallow zones. Such activities may generate localized discharge that would require management under applicable stormwater or dewatering permits issued by the Los Angeles Regional Water Quality Control Board. If not properly controlled, dewatering could cause erosion, affect adjacent soil stability, or mobilize fine sediments within the historic creek alignment. The need for and extent of dewatering would depend on the final design of proposed buildings, utilities, and site grading plans that would be developed for future developments. Therefore, groundwater impacts would be potentially **significant**.

Operation

During operation, the Proposed Project would not involve ongoing groundwater extraction, pumping, or subsurface activities that would alter groundwater levels. Permanent structures would be designed in accordance with site-specific geotechnical recommendations to address groundwater conditions identified during final design. Because no long-term groundwater withdrawal or alteration is proposed, operational impacts related to groundwater would be **less than significant**.

Compressible/Collapsible Soils and Settlement

As discussed in the existing conditions, localized zones of compressible and potentially collapsible alluvial soils have been identified within the Campus area. These soils can undergo volumetric changes when subjected to increased loads or moisture fluctuations, leading to differential settlement beneath proposed structures, slabs, and hardscape. The 2014 Master Plan EIR similarly concluded that compressible and collapsible soils are present on-site and could result in structural damage if not properly addressed during design and construction (County of Los Angeles 2014).

Settlement hazards may be exacerbated by variations in groundwater levels or the presence of undocumented fill, both of which have been noted in previous geotechnical investigations at the Campus. Without proper engineering controls, settlement could lead to cracking of foundations, floor slabs, and pavement. The Proposed Project involves the adaptive reuse of the General Hospital, demolition of select existing buildings, and construction of new multistory facilities and associated infrastructure. These activities would increase structural loads on site soils, thereby heightening the potential for differential settlement in areas underlain by compressible or collapsible materials. In addition, trenching for new utilities and grading associated with roadway, parking, and landscape improvements could disturb undocumented fill and expose variable subsurface conditions that contribute to settlement risk. Given the extent of demolition, excavation, and reconstruction planned across the Project Site under the Proposed Project, these conditions could result in localized ground movement and structural distress if not addressed. Therefore, impacts would be potentially **significant**.

Summary

As described above, the Proposed Project would have the potential to result in significant impacts associated with liquefaction, groundwater conditions during construction (including potential dewatering), and compressible or collapsible soils that could result in settlement during operation. Mitigation measure GEO-1 is applicable to the impacts identified as significant in this section.

Impact GEO-2: The Proposed Project could be located on unstable soils, and wet or saturated soils within excavations may cause instability.

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure GEO-1, which requires incorporation of site-specific geotechnical design recommendations (e.g., over-excavation and recompaction, use of deepened or mat foundations, or subdrainage to control moisture), would reduce risks from collapsible soils and settlement to less-than-significant levels. Mitigation Measure GEO-1 includes removal of compressible/collapsible soils and replacement with compacted fill. Additionally, under Mitigation Measure GEO-1, standard

structural design and mitigation techniques, including engineered shoring, waterproofed foundations, and dewatering practices, would be applied consistent with the CBC and Los Angeles County Building Code. Therefore, this would be considered a less-than-significant impact under construction and operational conditions with mitigation incorporated.

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

Expansive soils, if present, can undergo significant volume changes (shrinking or swelling) in response to variations in moisture content. Such expansion can damage improvements by causing cracking and heaving of shallow foundations, concrete slabs on grade, or pavement. Although sandy soils are generally not expansive, changes in soil moisture from rainfall, irrigation, or drainage conditions can exacerbate risks in areas with clay-rich soils.

Expansive Soils

According to the 2014 preliminary geotechnical evaluation prepared for the 2014 Master Plan and the 2022 geotechnical investigation for the Pharmacy building, the near-surface soils at the Project Site are composed predominantly of sandy, coarse-grained materials (GPI 2022 [Appendix F.5]). These soils typically have a low expansion potential. However, clayey soils may be present in areas that were not observed, and laboratory testing of silty clays and clayey silts at the location of the Pharmacy building indicated expansion indices of 11 to 23 and plasticity indices of 15 to 17, corresponding to a low to moderate expansion potential (GPI 2022 [Appendix F.5]). The 2022 investigation further noted that the underlying Puente Formation siltstone and sandstone bedrock may exhibit expansion potential if disturbed, particularly where weathered zones are encountered (GPI 2022 [Appendix F.5]).

In 2025, Geotechnologies Inc. conducted a review of the expansion index observed from representative soil samples. The on-site geologic materials were determined to have moderate to high expansion. The expansion index was found to be between 50 and 99 for bulk samples of the on-site soils (Geotechnologies Inc. 2025 [Appendix F.5]).

Additional investigations for the former Women's and Children's Hospital site and the RCV identified localized fine-grained soils with low to moderate expansion potential. The 2019 geotechnical investigation for the former Women's and Children's Hospital site demolition documented silty and clayey soils with expansion indices consistent with low to moderate potential (AECOM 2019 [Appendix F.4]). At the RCV, the 2018 and 2019 geotechnical investigations also reported the presence of clayey silts and colluvial deposits with potential for minor swelling when exposed to moisture (Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]). These findings confirm that while much of the Project Site is underlain by sandy, non-

expansive soils, isolated pockets of clay-rich alluvium and weathered Puente Formation bedrock may still be present, and if encountered, would present a low to moderate expansion risk.

Construction

Expansive soils are not expected to be widespread; however, localized areas with moderate to high expansion potential could be encountered during excavation for foundations, utilities, and landscaping improvements. Exposure and disturbance of clay-rich alluvium or weathered Puente Formation bedrock during grading could increase moisture sensitivity and swelling potential. If not properly evaluated and addressed during design and construction, expansive soils could lead to heaving, cracking, or differential movement of slabs and shallow foundations. Therefore, the impact would be potentially **significant**.

Operation

During operation, new and retained structures would be supported on foundations designed in accordance with site-specific geotechnical recommendations and the California Building Code to address expansion potential. Implementation of appropriate foundation site-specific design measures (e.g., moisture conditioning, engineered fill, or deepened foundations) would reduce the risk of long-term structural damage due to soil expansion. However, because moderate to high expansion indices have been documented in representative soil samples, the potential exists for structural distress if expansive soils are not properly addressed. Therefore, the impact would be potentially **significant**.

Corrosive Soils

The geologic environment of the Project Site could include soil conditions that would be corrosive to concrete and metals. Corrosive soil may exacerbate corrosion hazards for buried conduits, foundations, and other buried concrete or metal improvements. Multiple geotechnical investigations conducted across the Project Site have documented variable sulfate and chloride concentrations in site soils and electrical resistivity values indicative of corrosive potential (Ninyo & Moore 2014; Geocon West Inc. 2018, 2019 [Appendix F.2 and F.3]; AECOM 2019 [Appendix F.4]; GPI 2022 [Appendix F.5]; Geotechnologies, Inc. 2025 [Appendix F.6]). Localized areas were primarily identified near the historic creek alignment and other low-lying portions of the Project Site, where shallow groundwater and fine-grained soils create conditions more conducive to sulfate and chloride accumulation. These areas overlap with proposed utility corridors, landscaped open space, and parking improvements and could also affect new structural foundations along the southern and central portions of the Project Site. In these locations, soluble sulfates were present at levels capable of degrading conventional concrete, while elevated chloride concentrations could accelerate corrosion of buried metals (AECOM 2019 [Appendix F.3]; GPI 2022 [Appendix F.5]).

Construction

Construction of the Proposed Project would include installation of buried utilities, reinforced concrete foundations, and underground improvements within areas identified as having elevated sulfate and chloride concentrations. Without appropriate material specifications and protective design measures, corrosive soils could accelerate deterioration of concrete and metal components during and after installation. Therefore, impacts related to corrosive soils would be potentially **significant**.

Operation

During operation, buried utilities, foundations, and reinforced concrete elements would remain in contact with site soils for extended periods. In areas where corrosive conditions have been documented, long-term exposure could result in premature degradation of concrete and corrosion of metals if not properly designed and protected. Therefore, impacts related to corrosive soils would be potentially **significant**.

Summary

As described above, the Proposed Project would have the potential to result in significant impacts associated with expansive or corrosive soils. The following mitigation measure is applicable to the impacts identified as significant in this section.

Impact GEO-3: The Proposed Project could be located on expansive or corrosive soils that may create substantial risks to life or property.

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

Significance with Mitigation: Less than significant. To address risks due to expansive or corrosive soil, the 2022 geotechnical investigation recommends that expansive soils not be used directly beneath slabs or as retaining wall backfill unless they are moisture conditioned and compacted, or replaced with imported non-expansive fill (GPI 2022 [Appendix F.5]). Compliance with these recommendations, in accordance with Mitigation Measure GEO-1, along with site-specific geotechnical design measures prepared as part of individual building activities, would minimize the risk of damage from soil expansion and impacts would be less than significant. Additionally, with implementation of Mitigation Measure GEO-1, which requires compliance with project-specific geotechnical recommendations such as the use of sulfate-resistant cement, protective coatings, cathodic protection, or other corrosion mitigation techniques, impacts from corrosive soils would be reduced to a less-than-significant level under both construction and operational conditions.

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

The Project Site is in a fully urbanized area of the City of Los Angeles, and the Campus is already connected to the City of Los Angeles' sanitary sewer system. The Proposed Project would connect to this existing system and would not require the use of septic tanks or alternative wastewater disposal systems.

Construction

Construction of the Proposed Project would not include installation of septic tanks or alternative wastewater disposal systems. All temporary and permanent wastewater flows generated during construction would be managed through existing municipal sewer connections or approved temporary facilities, as applicable. Because no on-site wastewater disposal systems would be constructed, there would be **no impact** and no mitigation is necessary.

Operation

During operation, the Proposed Project would continue to connect to the existing City of Los Angeles sanitary sewer system. Existing utility infrastructure is already in place to serve the Project Site, and no reliance on on-site wastewater disposal would be required. Accordingly, the Proposed Project would not involve septic tanks or alternative wastewater disposal systems and would not result in soils incapable of adequately supporting such systems. Therefore, there would be **no impact** and no mitigation is necessary.

Significance without Mitigation: No impact. No mitigation is necessary. Implementation of the Proposed Project would not involve septic tanks or alternative wastewater disposal systems, and therefore would not result in soils incapable of adequately supporting such systems.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project Site is in a highly urbanized setting that has been extensively disturbed by prior development. As noted in the 2014 Master Plan EIR and the geotechnical evaluations prepared for the Project Site, shallow soils were encountered in prior subsurface investigations, where firm to very dense silts, clays, and sands were identified. These deposits are considered paleontologically sensitive because they have yielded vertebrate fossils elsewhere in the Los Angeles Basin and could therefore contain scientifically important remains. Such fossils could be encountered during deep excavations (e.g., foundations, utilities, or basement levels) that extend below the disturbed fill and younger alluvium. If present, disturbance of these older

alluvial deposits could result in the inadvertent destruction of fossils of regional scientific significance (County of Los Angeles 2014).

No unique geologic features have been previously recorded on the Project Site; however, known fossil localities are present within a mile of the Project Site. The four different geologies underlying the Project Site date to the Holocene (modern) era, which is not usually paleontologically sensitive. However, modern alluvial soil depth often is highly variable and location-specific, and this material normally covers older, more sensitive materials. Excavations deep enough to encounter this older more sensitive materials could therefore also impact paleontological resources if not properly managed (Envicom 2026 [Appendix E.1]).

Although the Project Site and City of Los Angeles are fully urbanized, Late Pleistocene (50,000 to 11,000 years old) localities that produced mammoth, mastodon, giant ground sloth, and saber-toothed cat are known from nearby locations. In addition, Miocene (22 to 5 million years old) localities that produced extinct herring and other fishes are also known nearby. Consequently, structural demolition and grading and excavation for new foundations and access routes, as well as excavation for parking structures, have the potential to destroy paleontological resources (County of Los Angeles 2014).

Construction

Structural demolition, grading, excavation for foundations and utilities, and excavation for parking structures under the Proposed Project would have the potential to disturb older alluvial deposits and, in localized areas, the Puente Formation. Because these units are considered to have moderate to high paleontological sensitivity, construction activities could directly or indirectly destroy unique paleontological resources if not properly managed. Therefore, impacts during construction would be potentially **significant**.

Impact GEO-4: Construction could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

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

Very shallow surficial excavations (i.e., less than 5 feet in depth) within areas of previous disturbance or areas of Quaternary younger alluvial deposits shall be monitored by the qualified paleontologist to ensure that underlying sensitive units (i.e., Quaternary older alluvium) are not adversely affected. Areas consisting of artificial fill materials shall not require monitoring.

If future excavations take place in Quaternary older alluvial deposits or within Fernando or Puente Formation bedrock, such excavations shall be monitored on a full-time basis by a qualified paleontological monitor and under the supervision of the qualified paleontologist. The paleontological resource monitoring shall include inspection of exposed rock units during active excavations within the geologically sensitive sediments. Monitoring may be reduced if some of the potentially fossiliferous units described herein are, upon exposure and examination by qualified paleontological personnel, determined to have a low potential for containing fossil resources.

The paleontological monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall have authority to temporarily divert grading away from exposed fossils to recover the fossil specimens professionally and efficiently and collect associated data. All efforts to avoid delays in project schedules shall be made.

To prevent construction delays, paleontological monitors shall be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment shall include handheld global positioning system receivers, digital cameras, and cell phones as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (awls, hammers, chisels, shovels, etc.), and plaster kits.

At each fossil locality, field data forms shall be used to record pertinent geologic data, stratigraphic sections shall be measured, and appropriate sediment samples shall be collected and submitted for analysis. Fossils collected, if any, shall be transported to a paleontological laboratory for processing where they shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility that meets federal and State curation standards and is approved in writing by the County of Los Angeles.

Following analysis, a Report of Findings with an appended itemized inventory of specimens shall be prepared by the qualified paleontologist within a reasonable timeframe from the completion of recovery. The report and inventory, when submitted to the County along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts on paleontological resources.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measure GEO-4, which requires the retention of a qualified paleontologist to monitor excavation, recover,

and curate significant fossils, and prepare a Report of Findings, impacts to paleontological resources or unique geologic features would be less than significant.

Operation

Operation of the Proposed Project would not involve ongoing ground disturbance or subsurface excavation beyond routine maintenance activities. Because paleontological resources would only be affected during ground-disturbing construction activities, operation of the Proposed Project would not result in direct or indirect destruction of unique paleontological resources or geologic features. Therefore, there would be **no impact** and no mitigation is required.

Significance without Mitigation: No impact. No mitigation is necessary.

3.6.5 Cumulative Impact Analysis

The cumulative context for geology and soils considers the Project Site, the 13 cumulative projects identified in Chapter 3, *Environmental Analysis*, of this Draft SEIR, and the broader regional seismic setting of the Los Angeles Basin. These elements represent the geographic scope within which cumulative impacts related to geology and soils could occur.

The 2014 Master Plan EIR identified cumulative development within surrounding neighborhoods; however, for purposes of this Draft SEIR, cumulative geology and soils impacts are evaluated based on the regional nature of seismic hazards and the site-specific nature of grading-related effects.

Would the project have a cumulative effect related to geology and soils?

SEISMIC-RELATED GROUND FAILURE

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased exposure of people or structures to seismic hazards such as surface fault rupture, strong ground shaking, liquefaction, or landslides. Because these hazards are associated with regional fault systems, soil conditions, and topography, the geographic context for cumulative seismic impacts is regional and includes the cumulative projects listed in Chapter 3, as well as other foreseeable development within the Los Angeles Basin.

Construction

During construction, the Proposed Project and cumulative projects would involve demolition, grading, excavation, and building activities within a seismically active region. These activities would expose construction workers and partially completed structures to regional seismic hazards, including ground shaking, liquefaction, and landslides. However, all projects must

comply with applicable seismic safety regulations, including the California Building Standards Code, the Alquist-Priolo Earthquake Fault Zoning Act, and local requirements for site-specific geotechnical evaluations. These standards ensure that structural design and construction practices reduce seismic risks to acceptable levels. Nevertheless, cumulative development in Southern California would be subject to seismic risk due to its location in an active fault region, and therefore cumulative seismic hazard impacts could be considered **significant**.

Operation

During operation, completed structures associated with the Proposed Project and cumulative projects would continue to be occupied within a seismically active region. Cumulative development would increase the number of people and structures exposed to regional seismic hazards over the long term. This would contribute to an overall cumulative effect. Therefore, cumulative impacts would be **significant**.

Impact GEO-5: The Proposed Project, together with past, present, and reasonably foreseeable project, would be located development within a seismically active region.

Mitigation: Implement Mitigation Measure GEO-1.

Significance with Mitigation: Less than significant. The Proposed Project would implement site-specific geotechnical design recommendations, such as those in Mitigation Measure GEO-1, which address localized conditions and ensure safe operational practices. Accordingly, the Proposed Project's contribution would not be cumulatively considerable. Therefore, with the implementation of mitigation, cumulative impacts related to surface fault rupture, seismic ground shaking, liquefaction, and landslides would be **less than significant**.

SOIL EROSION OR THE LOSS OF TOPSOIL

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the surrounding drainage area and watershed, including the cumulative project listed in Chapter 3, collectively caused substantial soil erosion or loss of topsoil and related off-site sedimentation. The geographic context for this issue is the local storm-drain catchments and receiving waters rather than the Project Site alone.

Construction

During construction, cumulative projects (like the Proposed Project) would involve grading, excavation, and trenching that can mobilize erodible soils. Because of the extent of construction activity in the region, cumulative erosion and sedimentation impacts could be considered significant if left unmanaged. However, these impacts are controlled through enforceable requirements: projects disturbing one acre or more must obtain coverage under the Construction General Permit, prepare and implement a SWPPP, and comply with local

stormwater regulations. Each of the identified cumulative projects would be subject to these same regulatory requirements. These requirements mandate on-site retention, infiltration, and treatment controls that confine sediment to work areas, prevent off-site transport during storms, and substantially reduce construction-phase erosion of cumulative projects.

The Proposed Project, consistent with all projects subject to the Construction General Permit, would be required to prepare and implement a SWPPP, incorporate site drainage and erosion-control BMPs, and comply with applicable stormwater regulations during construction. These enforceable regulatory requirements function as standard conditions of approval and ensure that erosion and sedimentation are minimized. Therefore, while cumulative erosion and topsoil loss impacts could occur within the broader watershed during construction, the Proposed Project's contribution would not be cumulatively considerable. Therefore, the Proposed Project's contribution would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Following construction, operational erosion potential would be reduced through permanent site drainage design and required LID features (e.g., bioretention, detention/wetland basins, stabilized outfalls). Routine maintenance of these BMPs would be part of project operations to ensure long-term performance. Though cumulative operational erosion impacts could also be significant if BMPs were not implemented, individual projects are required to comply with MS4/LID programs that prevent additive effects across project boundaries. Because erosion control is implemented at each site and sediment is retained within project boundaries, erosion from one project does not materially increase erosion risk at another site beyond shared watershed conditions.

The Proposed Project would incorporate permanent drainage and LID features consistent with applicable MS4 requirements. Therefore, while cumulative erosion and topsoil loss impacts could occur within the broader watershed during operation, the Proposed Project's contribution would not be cumulatively considerable. Therefore, the Proposed Project's contribution would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

UNSTABLE SOILS

Cumulative impacts would occur if the Proposed Project, in combination with other past, present, and reasonably foreseeable projects, resulted in a cumulatively significant increase in exposure of people or structures to hazards from unstable soils or geologic units, including landslides, lateral spreading, subsidence, liquefaction, or collapse.

Similar to the Proposed Project, the related cumulative projects identified in Chapter 3, as well as other foreseeable development in the surrounding area, may be located on sites with varying soil conditions, including areas susceptible to liquefaction, compressible soils, or localized slope instability. Because of these conditions, cumulative unstable soil impacts could be considered significant at a regional scale if projects were not required to implement site-specific engineering controls.

Construction

During construction, the Proposed Project and cumulative projects would involve grading, excavation, and foundation preparation in areas that may contain unstable soils, including liquefiable or compressible materials. Implementation of multiple projects within the cumulative study area would increase the potential for construction activities to occur in areas with unstable soil conditions. Each cumulative project would be required to comply with applicable building code requirements and incorporate site-specific geotechnical recommendations into final design. Although unstable soil hazards are site-specific and addressed independently through required engineering design and construction measures, the presence of regionally susceptible soil conditions indicates that multiple projects could encounter unstable soils requiring specialized engineering and construction measures.

Because the Proposed Project could be located on unstable soils and would require grading and foundation preparation in such areas, its contribution to cumulative impacts related to unstable soils during construction would be cumulatively considerable without mitigation. Therefore, cumulative impacts related to unstable soils during construction would be **significant**.

Operation

During operation, completed structures associated with the Proposed Project and cumulative projects would remain subject to underlying soil conditions, including areas that may contain unstable or compressible soils. Cumulative development would increase the number of structures and occupants located within areas of variable soil conditions, which could increase the potential for structural damage or risk to occupants if unstable soil conditions are not properly addressed.

Because the Proposed Project could place structures and occupants in areas with unstable soil conditions, its contribution to cumulative impacts related to unstable soils during operation would be cumulatively considerable without mitigation. Therefore, cumulative impacts would be **significant**.

Impact GEO-6: The Proposed Project, together with past, present, and reasonably foreseeable projects, could be located on unstable soils.

Mitigation: Implement Mitigation Measure GEO-1.

Significance with Mitigation: Less than significant. Because unstable soil hazards are inherent to site conditions and mitigated through required engineering controls at each project location, cumulative development does not increase the underlying instability risk beyond regional geologic conditions. While cumulative unstable soil impacts may be significant in the region, with the implementation of Mitigation Measure GEO-1, the Proposed Project's contribution would not be cumulatively considerable during construction and operation. Mitigation Measure GEO-1 requires incorporation of site-specific geotechnical design recommendations, including removal and replacement of compressible or collapsible soils, over-excavation and recompaction, use of engineered fill, deepened or mat foundations, subdrainage systems to control moisture, dewatering as necessary, and appropriate shoring and structural design consistent with the CBC and Los Angeles County Building Code. These measures are standard engineering controls that address unstable soils at the project level. Therefore, cumulative impacts would be **less than significant.**

EXPANSIVE AND CORROSIVE SOILS

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, substantially increased regional risks related to expansive soils. The presence and severity of expansive soils are highly localized, depending on site-specific geologic and soil conditions.

Similar to the Proposed Project, the cumulative projects identified in Chapter 3, as well as other foreseeable development in the surrounding area, could encounter expansive or corrosive soils. Because these conditions occur across portions of Southern California, cumulative expansive soil impacts could be considered significant at a regional level if projects did not implement appropriate engineering controls.

Construction

During construction, the Proposed Project and cumulative projects would involve grading and foundation preparation in areas that may contain expansive or corrosive soils. As identified under impact discussion (d), expansive soils could create risks of slab heave, settlement, or structural distress if not properly addressed, and corrosive soils could degrade concrete or buried utilities over time. Implementation of multiple projects within the cumulative study area would increase the potential for grading and foundation construction to occur in areas with expansive or corrosive soil conditions.

Although expansive and corrosive soil conditions are typically site-specific, these soil types are known to occur within the region, and development within the cumulative study area could result in multiple projects encountering such conditions. Because the Proposed Project could involve construction in areas with expansive or corrosive soils, its contribution to cumulative impacts related to expansive and corrosive soils during construction would be cumulatively

considerable without mitigation. Therefore, cumulative impacts during construction would be **significant**.

Operation

During operation, completed structures associated with the Proposed Project and cumulative projects would remain subject to underlying soil conditions, including areas with expansive or corrosive soils. Cumulative development would increase the number of structures constructed within areas of expansive or corrosive soils, which could increase the potential for structural damage or degradation of building materials and utilities if such conditions are not properly addressed.

Because the Proposed Project could place structures and associated infrastructure in areas with expansive or corrosive soils, its contribution to cumulative impacts related to expansive and corrosive soils during operation would be cumulatively considerable without mitigation. Therefore, cumulative impacts during operation would be **significant**.

Impact GEO-7: The Proposed Project, together with past, present, and reasonably foreseeable projects, could be located on unstable soils.

Mitigation: Implement Mitigation Measure GEO-1.

Significance with Mitigation: Less than significant. The Proposed Project would implement Mitigation Measure GEO-1 during construction and operation. Mitigation Measure GEO-1 requires incorporation of site-specific geotechnical recommendations into project design, including removal or treatment of expansive soils, moisture conditioning and recompaction, replacement with non-expansive imported fill beneath slabs and retaining wall backfill, use of sulfate-resistant cement, protective coatings, cathodic protection, and other corrosion mitigation techniques as appropriate. These measures are consistent with the recommendations of the 2022 geotechnical investigation and applicable building code requirements.

ALTERNATE WASTEWATER DISPOSAL

Construction

The Proposed Project is in a fully urbanized portion of Los Angeles served by the municipal sanitary sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. The related cumulative projects identified in Chapter 3, as well as other foreseeable development in the surrounding area, would also connect to the municipal system during construction. Because neither the Proposed Project nor related development would rely on septic systems, there would be no cumulative demand for soils to support such systems

during construction. Therefore, the Proposed Project's contribution would not be cumulatively considerable and **no impact** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

During operation, the Proposed Project would connect to and be served by the existing municipal sanitary sewer system and would not require septic tanks or alternative wastewater disposal systems. Similarly, the related cumulative projects would connect to the municipal system. Because no cumulative projects would rely on on-site wastewater disposal, there would be no cumulative demand for soils to support septic systems. Accordingly, the Proposed Project would not contribute to any cumulative impact related to septic tanks or alternative wastewater disposal systems during operation. Therefore, the Proposed Project's contribution would not be cumulatively considerable and **no impact** would occur**.**

Significance without Mitigation: No impact. No mitigation is necessary.

PALEONTOLOGICAL RESOURCES

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively resulted in the loss of significant paleontological resources or unique geologic features in the region. Paleontological resources are considered nonrenewable, and incremental losses from multiple projects could represent a cumulatively significant impact.

Similar to the Proposed Project, the related cumulative projects identified in Chapter 3, as well as other foreseeable development in the Los Angeles Basin, are often in areas that have been previously disturbed, but deep excavations can encounter sensitive geologic units such as older Quaternary alluvium or sedimentary formations with moderate to high paleontological potential. Because cumulative projects could result in incremental losses of fossils if not mitigated, cumulative impacts on paleontological resources are considered potentially significant. However, all projects subject to CEQA are required to evaluate paleontological sensitivity and adopt appropriate mitigation where resources may be present. Standard measures include retaining a qualified paleontologist to monitor ground-disturbing activities, recover scientifically important fossil specimens, and curate them at an accredited repository to ensure long-term preservation and availability for research. Each of the identified cumulative projects would be subject to this same regulatory framework and required to implement site-specific paleontological mitigation, as appropriate.

Construction

During construction, cumulative projects, including the Proposed Project, would involve grading and excavation that could encounter sensitive geologic units. containing paleontological resources. Development within the cumulative study area would increase the potential for disturbance of fossil-bearing sediments, resulting in the permanent loss of scientifically important paleontological resources at a regional scale. Because the Proposed Project would involve ground-disturbing activities within geologic units that may contain paleontological resources, its contribution to cumulative impacts related to paleontological resources during construction would be cumulatively considerable without mitigation. Therefore, cumulative impacts related to paleontological resources would be **significant**.

Impact GEO-8: The Proposed Project, together with past, present, and reasonably foreseeable projects, could destroy a unique paleontological resource or unique geologic feature.

Mitigation: Implement Mitigation Measure GEO-4.

Significance with Mitigation: Less than significant. The Proposed Project would implement Mitigation Measure GEO-4, which requires monitoring of excavations in sensitive geologic units, rapid recovery of fossil resources, and curation with a qualified institution. With implementation of Mitigation Measure GEO-4, paleontological resources encountered during construction would be documented, recovered, and curated in accordance with professional standards, thereby reducing impacts to less than significant levels, as fossils encountered during construction would be preserved rather than inadvertently destroyed. Because cumulative projects would implement comparable mitigation and regulatory requirements, potential impacts would be addressed on a project-by-project basis and would not combine to result in a cumulatively considerable contribution from the Proposed Project. With the implementation of mitigation, the Proposed Project's contribution would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Operation

During operation, the Proposed Project would not involve ongoing subsurface excavation or ground disturbance that would expose previously undisturbed fossil-bearing units. Similarly, operation of related cumulative projects would not result in additional disturbance of paleontological resources beyond construction-related activities already addressed. Accordingly, the Proposed Project would not contribute to cumulative operational impacts on paleontological resources or unique geologic features. Therefore, the Proposed Project's contribution would not be cumulatively considerable, and cumulative impacts would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.6.6 Comparison to the 2014 Master Plan EIR Impact Analysis

Impacts to geology and soils in both the 2014 Master Plan EIR and this Draft SEIR for the Proposed Project resulted in similar impact conclusions, because the overall amount of ground-disturbing activity provided by both projects is similar. While overall land use development densities are higher for the Proposed Project than the 2014 Master Plan, both projects assumed ground-disturbing activities across the entire Project Site, resulting in similar physical impacts. Additionally, seismic-related hazard conditions present in the region are the same for both, given the Project Site location is the same.

As described in Section 3.6.4, *Project Impact Analysis*, and 3.6.5, *Cumulative Impact Analysis*, the Proposed Project would result in several potentially significant impacts that would be reduced to a less-than-significant level with implementation of mitigation measures. These include seismic hazards (fault rupture, strong ground shaking, liquefaction, and slope stability), soil erosion, groundwater and subsidence, compressible and collapsible soils, expansive soils, corrosive soils, and paleontological resources. With the implementation of Mitigation Measures GEO-1 and GEO-4, each of these impacts would be reduced to a less-than-significant level.

As previously shown in Table 3.6-2, *Summary of the 2014 Master Plan EIR Geology and Soils Impact Conclusions*, the 2014 Master Plan EIR reached similar conclusions, identifying potentially significant impacts in these same topic areas that were reduced to a less-than-significant level with mitigation. Consistent with the findings from the 2014 Master Plan EIR, this Draft SEIR concludes that no significant and unavoidable impacts related to geology, soils, or paleontological resources would result from implementation of the Proposed Project. The mitigation measures for geology and soils in the 2014 Master Plan EIR remain applicable to the Proposed Project, with the exception of Mitigation Measure GEO-2 from the 2014 Master Plan EIR, which has been removed because it required compliance with existing regulatory requirements (i.e., NPDES permit and SWPPP) that apply to all projects. The remaining measures (renumbered as Mitigation Measure GEO-1 and Mitigation Measure GEO-4 in this Draft SEIR) are carried forward from the 2014 Master Plan EIR with only minor revisions for clarity. These revisions do not alter the substance or intent of the measures. Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.7 GREENHOUSE GAS EMISSIONS

This chapter of the Draft SEIR discusses potential impacts to greenhouse gas (GHG) emissions from the implementation of the Proposed Project. This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential GHG emission impacts, and identifies feasible mitigation measures that could mitigate any potentially significant impacts. GHG emissions modeling is included in Appendix C, *Air Quality and Greenhouse Gas Emissions Modeling*, of this Draft SEIR.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025 to November 21, 2025, comments were received regarding GHG emissions associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where a comment regarding GHG was received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are summarized in Table 1-1, *Summary of Scoping Meeting Comments Received*. Comments related to GHG were considered in the preparation of this analysis.

Terminology

The following are definitions for terms used throughout this section.

- **CARB.** California Air Resources Board.
- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon dioxide-equivalent (CO_2e)**. The standard unit to measure the amount of GHGs in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.
- **SCAG.** Southern California Association of Governments.

GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to

a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).[1,2]

The major GHGs applicable to the Proposed Project are briefly described.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 3.7-1, Common *GHGs and Their Relative Global Warming Potential*. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fifth Assessment Report (AR5), GWP values for CH_4, 10 MT of CH_4 would be equivalent to 280 MT of CO_2.

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals); however, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

[2] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB 2022). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

Table 3.7-1 Common GHGs and Their Relative Global Warming Potential

GHGs	Fourth Assessment Report (AR4) GWP Relative to CO_2 [1]	Fifth Assessment Report (AR5) GWP Relative to CO_2 [1]	Sixth Assessment Report (AR6) GWP Relative to CO_2 [1]
Carbon Dioxide (CO_2)	1	1	1
Methane[2] (CH_4)	25	28	30
Nitrous Oxide (N_2O)	298	265	273

Source: IPCC 2007, 2013, and 2023.

Notes: GWP = global warming potential. The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect latest information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO_2. However, GWP values identified in AR4 are used by the 2022 Scoping Plan for long-term emissions forecasting.

1 Based on 100-year time horizon of the GWP of the air pollutant compared to CO_2.

2 The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO_2 is not included.

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant (IPCC 2001). During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities.

The recent IPCC Sixth Assessment Report (AR6) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO_2 have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5°C warming (CARB 2022). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, and other conditions. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by

varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts for California

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near-term, even for the very low GHG emissions scenario (IPCC 2022). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most areas of California is already 1°F (~0.56°C) higher than historical levels, and some areas have seen average increases in excess of 2°F (~1.1°C) (CalOES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario, in which no new actions are taken to curb GHG emissions:

- Annual average daily high temperatures in California are expected to rise by 2.7°F by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.
- Droughts are likely to become more frequent and persistent through 2100.[3]

[3] Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015 (OEHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015 (OEHHA 2018).

- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.
- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) would occur 50 percent more frequently. The maximum area burned statewide may increase 178 percent by the end of the century.
- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs. (CalOES 2020)

Global climate change risks to California are shown in Table 3.7-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snow pack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure

Table 3.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pest and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014; CalOES 2020.

3.7.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency* (2007) 549 U.S. 497, that CO_2 and other GHGs are pollutants under the Clean Air Act (CAA), which the US Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. Subsequently and in response to the 2007 U.S. Supreme Court endangerment ruling, the UUSEPA announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The USEPA's final findings do not impose any emission reduction requirements, but allow the USEPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, the USEPA was required to issue an endangerment finding (USEPA 2025a). The finding identified emissions of six key GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the Proposed Project's GHG emissions inventory because they constitute the majority of GHG emissions and should be evaluated as part of a project's GHG emissions inventory.

On January 20, 2025, the President of the United States signed an executive order, *Unleashing American Energy*, which directed the USEPA to eliminate the social cost of carbon calculation from any federal permitting or regulatory decision and submit recommendations on the legality and continued applicability of the 2009 endangerment finding, among other directives (White House 2025). On July 29, 2025, the USEPA released its proposal to rescind the 2009 endangerment finding and repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines pursuant to CAA Section 202(a) (USEPA 2025c). The proposed rule would remove GHG-related provisions from 40 CFR Part 600 without affecting provisions related to Corporate Average Fuel Economy (CAFE) standards and fuel economy labeling (Vol. 90 Federal Register, No. 146, 36288.). On February 12, 2026, USEPA finalized its rescission of the 2009 Greenhouse Gas Endangerment Finding.

Corporate Average Fuel Economy Standards.

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE Standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the EPA finalized updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. On December 21, 2021, under direction of Executive Order 13990 issued by President Biden, the National Highway Traffic Safety Administration (NHTSA) repealed SAFE Vehicles Rule Part One, which had preempted State and local laws related to fuel economy standards. In addition, on March 31, 2022, the NHTSA finalized new fuel standards that will increase fuel efficiency eight percent annually for model years 2024 to 2025 and 10 percent annually for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which will be a 10 mpg increase compared to model year 2021 (NHTSA 2022).

On June 7, 2024, the NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The NHTSA released new subsequent proposed standards on December 3, 2025 under the SAFE Vehicle Rule III. The new proposed CAFE standards set a 0.5 percent increase in fuel efficiency per year for model year 2023 through 2026 passenger vehicle and light trucks. In addition, it also sets a 0.35 percent and 0.70 percent increase for MY 2027 passenger vehicles and light trucks, respectively, a 0.25 percent increase for MY 2028-2031 light duty vehicles, and a fuel economy standard of 34.5 MPG for MY 2031 light duty vehicles (NHTSA 2025b).

Furthermore, on June 11, 2025, the NHTSA published the final rule, "Resetting the Corporate Average Fuel Economy Program." This interpretive rule issued by the NHTSA does not immediately change or reverse current fuel economy standards; however, the rule clarifies the NHTSA's interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered electric vehicles (EVs) when identifying the "maximum feasibility" average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025a).

Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

In 2024, the USEPA issued a final rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with MY 2027 (USEPA 2025b).

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05, Assembly Bill (AB) 32, AB 1279, Senate Bill (SB) 32, EO B-30-15, and SB 375.

Executive Order S-03-05

EO S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state: 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

Assembly Bill 32, Global Warming Solutions Act (2006)

Commonly known as its legislative bill number (AB 32), this act was signed August 31, 2006, to reduce California's contribution of GHG emissions. AB 32 follows the 2020 tier of emissions-

reduction targets established in EO S-03-05. The California Air Resources Board (CARB) prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires State agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaptation strategy, Safeguarding California, to ensure climate change is accounted for in State planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, SB 32 and AB 197 were signed, making the EO goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB was required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan Update

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic (human-caused) GHG emissions (CARB 2022). The 2022

Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. This 2022 Scoping Plan expands on earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent Sixth Assessment Report of the IPCC and the measures would achieve 85 percent below 1990 levels by 2045 in accordance with AB 1279. CARB's 2022 Scoping Plan identifies strategies, as shown in Table 3.7-3, *Priority Strategies for Local Government Climate Action Plans*, that would be most impactful at the local level for ensuring substantial progress toward the State's carbon neutrality goals.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide electric vehicle (EV) charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed State building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
Vehicle Miles Traveled (VMT) Reduction	Reduce or eliminate minimum parking standards.
	Implement complete streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, and other approaches.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.
	Implement parking pricing or transportation demand management pricing strategies.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).
	Adopt all-electric new construction reach codes for residential and commercial uses.

Table 3.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Building Decarbonization	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022.

For residential and mixed-use development projects, CARB recommends this first approach to demonstrate that these land use development projects are aligned with State climate goals based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing.

Key residential and mixed-use project attributes that reduce GHGs:

- **Transportation Electrification.** Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code (CALGreen) at the time of project approval.
- **Vehicle Miles Traveled Reduction**
  - Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
  - Does not result in the loss or conversion of the State's natural and working lands.
  - Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre) or is in proximity to existing transit stops (within a half mile) or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
  - Reduces parking requirements by:
    - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet);

  - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or
  - For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
- At least 20 percent of the units are affordable to lower-income residents.
- Result in no net loss of existing affordable units.

- **Building Decarbonization.** Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

The second approach to project-level alignment with State climate goals is net-zero GHG emissions. The third approach to demonstrating project-level alignment with State climate goals is to align with GHG thresholds of significance, which many local air quality management and air pollution control districts have developed or adopted (CARB 2022).

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (i.e., excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018. Per the 2018 updates, CARB's updated SB 375 targets for the SCAG region were an 8 percent per-capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per-capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018). CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets (CARB 2025).

The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to

incentivize positive planning and action toward sustainable communities. The updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks compared to 2005. This excludes reductions anticipated from implementation of State technology and fuels strategies and any potential future State strategies such as statewide road user pricing. The updated targets call for greater per-capita GHG emission reductions from SB 375 than were currently in place, which for 2035 translates into updated targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. CARB's updated targets result in an additional reduction of over 8 $MMTCO_2e$ in 2035 compared to the prior targets (CARB 2018).

Transportation Sector Specific Regulations

Advanced Clean Trucks

In March 2021, CARB approved the Advanced Clean Trucks (ACT) regulation to accelerate the transition to zero-emission Class 2b and Class 8 medium- and heavy-duty trucks through manufacturer sales requirements. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **ZE Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell ZE trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, ZE truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting:** Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available ZE trucks and place them in service where suitable to meet their needs.

The ACT regulation was granted a separate waiver in 2023 by the Biden administration. On May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for California's ACT rule through House Joint (H.J.) Resolution 87. On June 12, 2025, President Trump formally nullified California's ACT rule. California currently has no authority to implement ACT.

Advanced Clean Fleets

CARB adopted the Advanced Clean Fleets (ACF) regulation in April 2023, requiring the use of ZEVs for targeted fleets and that manufacturers only produce ZEV trucks starting in 2036. The ACF regulation was adopted to complement the recently adopted ACT regulation to help advance the introduction of ZE technology into California's trucks and bus fleets. By 2050, the

ACF regulation is expected to introduce 1,690,000 ZEVs into the California fleet and result in $26.5 billion in statewide health benefits from improved air quality. This regulation will help contribute to the goals set by EO N-79-20 (described further below) and will help achieve emission reductions outlined in the State Implementation Plan, SB 350, AB 32, SB 32, and AB 32. The regulation has four components including a manufacturer sales mandate, drayage fleets requirements, high priority and federal fleets phase-in, and State and local agency procurement requirements.

On January 13, 2025, CARB withdrew their requests for the federal CAA waiver from the US EPA needed to support the ACF regulation. In addition, on September 25, 2025, CARB repealed the ACF drayage truck requirements (13 CCR § 2014) and the high priority and federal fleet requirements (13 CCR § 2015 through 2015.6). California currently has no authority to implement ACF.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the US EPA. In 2012, the US EPA issued a Final Rulemaking that set even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (See also the discussion in federal regulations under "*Corporate Average Fuel Economy Standards*."). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of ZEVs into a single package of standards.

Executive Order S-01-07

On January 18, 2007, the State set a new low carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S-01-07 set a declining standard for GHG emissions measured in CO_2e gram per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels, and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the "fuel cycle."

Executive Order B-16-2012

On March 23, 2012, the State directed CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle

Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZEVs in major metropolitan areas, including infrastructure to support them (e.g., EV charging stations). EO B-16-2012 also directed the number of ZEVs in California's State vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

Executive Order N-79-20

On September 23, 2020, Governor Newsom signed EO N-79-20, establishing a goal that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the state are ZE by 2045, where feasible. The EO's goal for the state is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible. Advanced Clean Cars II (ACC II) approved by CARB on August 25, 2022, codified the zero-emission vehicle transition goal established under EO-N-79-20 and set low-emission and zero-emission vehicle standards for model year 2026 through 2035 vehicles. However, on May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for the ACC II program through congressional resolution House Joint (H.J.) Resolution 88. On June 12, 2025, President Trump signed the resolution, which formally nullified ACC II. Currently, implementation of ACC II is unknown.

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewables portfolio standard established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the State's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Eligible renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

SB 350 (de Leon) was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new

goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

Energy Efficiency Regulations

California Building Energy Code: Title 24, Part 6, Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods.

In 2024, the CEC adopted the 2025 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission. The 2025 standards became effective and replaced the existing 2022 standards on January 1, 2026. The 2025 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers.

California Building Code: Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.[4] The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update became effective on January 1, 2026, and provides updates to the residential and non-residential voluntary measures.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Diversion Regulations

Assembly Bill 939: Integrated Waste Management Act of 1989

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multi-family residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous

[4] The green building standards became mandatory in the 2010 edition of the Code.

construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The Act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Assembly Bill 1826

In October 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multi-family residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

Water Efficiency Regulations

Senate Bill X7-7

The 20x2020 Water Conservation Plan was issued by the California Department of Water Resources (DWR) in 2010 pursuant to SB 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized DWR to prepare a plan implementing urban water conservation requirements, which DWR did through the 20x2020 Water Conservation Plan. In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of a 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

Assembly Bill 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires CEC to consult with DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and

valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required CARB, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the State's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017). In-use on-road rules were expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

REGIONAL

SCAG's 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare an SCS in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

LOCAL

County of Los Angeles General Plan

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) includes goals and policies in the Air Quality Element to reduce GHG emissions impacts. Goals and policies that apply to the Project include the following below (County of Los Angeles 2015).

Goal AQ 2: The reduction of air pollution and mobile source emissions through coordinated land use, transportation and air quality planning.

- **Policy AQ 2.2.** Coordinate with local, regional, state, and federal agencies to develop and implement community and regional air quality plans and programs.
- **Policy AQ 2.3.** Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.
- **Policy AQ 2.5.** Encourage land use development and design that integrates GHG emission reduction strategies through increasing residential density and infill development, especially affordable housing and diversity of destinations near High-Quality Transit Areas.
- **Policy AQ 2.6.** Expand infrastructure to accommodate transit and alternative modes of transportation to serve residential, employment, and recreational trips.
- **Policy AQ 2.7.** Explore the feasibility of parking strategies that limit or remove parking minimums to reduce vehicular trips.
- **Policy AQ 2.8.** Encourage and support the development and implementation of Zero-Emission technology and infrastructure in an equitable manner to ensure access to all County residents.
- **Policy AQ 2.9.** Electrify entire County light-duty and bus and shuttle fleet vehicles.

Goal AQ 3: Implementation of plans and programs to address the impacts of climate change.

- **Policy AQ** 3.1. Facilitate the implementation and maintenance of the Climate Action Plan through future County programs to ensure that the County reaches its climate action and greenhouse gas emission reduction goals, and consider projects with an enforceable legal obligation to achieve “net zero” greenhouse gas (GHG) emissions, including by voluntary agreement to resolve litigation or with a government agency, to help the County achieve the long-term goals of the CAP.
- **Policy AQ 3.2**. Reduce energy consumption in existing buildings and County operations through energy efficiency retrofits.
- **Policy AQ 3.4**. Participate in local, regional and state programs to reduce greenhouse gas emissions.
- **Policy AQ 3.5**. Phase in the decarbonization of existing and new development.

- **Policy AQ 3.6**. Support local solar power generation on new and existing buildings and parking lots.
- **Policy AQ 3.9**. Ensure the availability of zero-carbon electricity to serve unincorporated Los Angeles County.
- **Policy AQ 3.11**. Promote sustainable waste practices through public outreach, educational programs, and mandates.
- **Policy AQ 3.12**. Ensure and promote the availability of organics waste and recyclable materials diversion services for beneficial use, such as composting, energy production, and upcycling.
- **Policy AQ 3.13.** Collaborate with environmental organizations, businesses, schools, and the general public to promote the importance of climate action.

County of Los Angeles Climate Action Plan

The County of Los Angeles adopted its 2045 Climate Action Plan (CAP) on June 25, 2024 and serves as an implementation program of the County's General Plan Air Quality Element.[5] The 2045 CAP is a comprehensive and actionable plan for implementing the GHG emissions reduction policies of the Air Quality Element and for reducing GHG emissions in the unincorporated areas of the County. It identifies detailed programs, actions, and performance goals that provide a road map to achieving the County's three targets and one aspirational goal The three targets and aspirational goal are:

- Target: 40 percent below 2015 levels by 2030
- Target: 50 percent below 2015 levels by 2035
- Target: 85 percent below 2015 levels by 2045
- Aspirational: Achieve carbon neutrality by 2045

The three targets will ensure that the County contributes its fair share to statewide GHG emissions reduction as defined by Senate Bill 32 (reduce statewide anthropogenic GHG emissions to 40% below 1990 levels by 2030) and Assembly Bill 1279 (reduce statewide anthropogenic GHG emissions at 85% below 1990 levels by 2045). The 2045 CAP also includes an aspirational goal to reach carbon neutrality by 2045 to further align with the State's climate goal in AB 1279 to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045. The 2045 CAP includes 10 strategies, 25 measures, and 94 actions across all GHG emissions-producing sectors (County of Los Angeles 2025).

[5] The 2045 CAP replaced the previous 2020 County Climate Action Plan, which was adopted as a component of the General Plan Air Quality Element and served as the prior implementation program.

Implementing the 2045 CAP requires coordination across County departments; collaboration with community partners, residents, and other stakeholders; identification of funding opportunities; and integration of 2045 CAP implementation with other County planning and administrative processes. The 2045 CAP is a dynamic document that will be monitored and evaluated for its effectiveness on an ongoing basis. Monitoring allows the County to make timely adjustments to implementing actions as technologies, federal and state programs, and circumstances change.

The 2045 CAP meets the requirements under CEQA Guidelines Section 15183.5(b) as a qualified CAP due to the following (County of Los Angeles 2024):

- Quantifies all primary sectors of GHG emissions associated with all activities occurring within unincorporated Los Angeles County over which the County has some level of jurisdictional control or influence for 2015 through 2045;
- Establishes GHG emissions reduction targets for 2030, 2035, and 2045, below which GHG emissions would not be cumulatively considerable based on the substantial evidence that the 2045 CAP is consistent with the 2022 Scoping Plan, Senate Bill (SB) 32, and AB 1279,2 as well as an aspirational goal for 2045;
- Analyzes community emissions for unincorporated Los Angeles County as a whole and including predicted growth expected by 2045;
- Includes specific mandatory and voluntary measures that quantitatively achieve the overall reduction targets for 2030, 2035, and 2045, and make progress toward the aspirational goal for 2045;
- Includes an implementation and monitoring program that contains performance indicators and targets, details regarding funding and financing strategies, a list of available and expected funding sources, and a table for monitoring and reporting progress on the measures and their implementing actions; and
- Adopted through a public process in compliance with CEQA.

Because the 2045 CAP constitutes as a qualified GHG emissions reduction plan under CEQA Guidelines Section 15183.5(b), it may be used for CEQA streamlining by future individual projects in unincorporated parts of Los Angeles County requiring discretionary approvals if they are consistent with the County of Los Angeles General Plan future growth projections. The CAP does not account for growth and emissions associated with County-owned properties within incorporated cities and is not directly applicable to these types of properties for streamlining purposes. Projects that demonstrate consistency with the General Plan future growth projections may show compliance with the 2045 CAP either by achieving net-zero emissions or showing consistency with the 2045 CAP CEQA Streamlining Checklist. Projects that are consistent with the 2045 CAP Checklist would be considered to result in less than significant GHG emissions impacts. Use of the 2045 CAP Checklist is voluntary.

City of Los Angeles General Plan

Air Quality Element

The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles (City of Los Angeles 1992). Adopted in November 1992, the City's General Plan includes goals, objectives, and policies that help define how the City will achieve its clean air goals. The Air Quality Element's six goals are as follows:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non- work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand- management techniques
- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

3.7.2 Existing Conditions

CALIFORNIA'S GHG SOURCES AND RELATIVE CONTRIBUTION

In 2024, the statewide GHG emissions inventory was updated for 2000 to 2022 emissions using the GWPs in IPCC's AR4 and reported that California produced 371.1 $MMTCO_2e$ GHG emissions in 2022 (2.4 percent lower than 2021 levels). The 2022 emissions data shows that California is continuing its established long-term trend of GHG emissions declines, despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic. In 2014, statewide GHG emissions dropped below the 2020 GHG Limit (AB 32 target for year 2020) and have remained below the limit since that time. Additionally, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product) is declining (CARB 2024).

California's transportation sector was the single-largest generator of GHG emissions, producing 37.7 percent of the state's total emissions. Industrial sector emissions made up 19.6 percent, and electric power generation made up 16.1 percent of the state's emissions inventory (CARB 2024). Other major sectors of GHG emissions include residential and commercial (10.6 percent),

agriculture and forestry (8.0 percent), high GWP (5.7 percent), and recycling and waste (2.2 percent) (CARB 2024).

Emissions from the transportation sector decreased compared to 2021, primarily due to a greater share of fuels used for on-road transportation being produced from non-fossil resources. Industrial sector decreases from 2021 to 2022, most notably in the oil and gas production sector. Electricity emissions also decreased compared to 2021 from the continued growth of in-state solar generation and increases to in-state hydropower and imported wind power. High-GWP gases continue to replace ozone-depleting substances being phased out under the 1987 Montreal Protocol and emissions from this sector have been stable from 2020 to 2022 (CARB 2024).

EXISTING EMISSIONS

The existing land uses within the Project area consist primarily of medical and clinical uses and ancillary supporting facilities. These operations currently generate GHG emissions from vehicle trips, building energy use, water use, solid waste generation, and refrigerants. Table 3.7-4, *Annual Operational Phase GHG Emissions Inventory: Existing Uses*, shows the estimated daily emissions generated by the existing uses within the Project Site.

Table 3.7-4 Annual Operational Phase GHG Emissions Inventory: Existing Uses

Sector	Full Buildout ($MTCO_2e$/yr)	Percent of Total
Mobile[1]	63,098	60%
Area	77	<1%
Energy	38,938	37%
Water/Wastewater	337	<1%
Solid Waste	2,298	2%
Refrigerants	1	<1%
Total	**104,749**	**100%**

Source: Appendix C.

Note:

1. Based on calendar year 2025 CalEEMod vehicle emissions data.

3.7.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the Proposed Project would result in a significant impact related to greenhouse gas emissions if it would:

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.

State CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance impacts from GHG emissions. Section 15064.4(a) provides that a lead agency should make a good-faith effort based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions that would result from a project. State CEQA Guidelines Section 15064.4(b) also provides that, when assessing the significance impacts from GHG emissions, a lead agency should consider (1) the extent to which the project may increase or reduce GHG emissions compared to the existing environment, (2) whether the project exceeds an applicable significance threshold, and (3) the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. In addition, per Section 15064.7(c), a lead agency may consider thresholds of significance established or adopted by other public agencies (e.g., air districts), or recommended by experts, provided the chosen threshold is supported by substantial evidence.

SOUTH COAST AQMD PROPOSED GHG SIGNIFICANCE THRESHOLDS

The South Coast Air Quality Management District (South Coast AQMD) is the responsible agency for air quality planning in the South Coast Air Basin (SoCAB) and developing and enforcing rules and regulations to bring the SoCAB into attainment of the ambient air quality standards. Additionally, South Coast AQMD also oversees and provides guidance on GHG emissions in the SoCAB. South Coast AQMD has adopted a significance threshold of 10,000 $MTCO_2e$ per year for permitted (stationary) sources of GHG emissions for which it is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast AQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting (Meeting No. 15) in September 2010, South Coast AQMD identified a tiered approach for evaluating GHG emissions for development projects where South Coast AQMD is not the lead agency (South Coast AQMD 2010a). The following tiered approach has not been formally adopted by South Coast AQMD.

- **Tier 1.** If a project is exempt from CEQA, project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and contribution to significant cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level criterion, project-level and contribution to significant cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, South Coast AQMD requires an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The South Coast AQMD Working Group identified that because construction activities would result in a "one-time" net increase in GHG emissions, construction emissions should be amortized over 30 years and added into the operational phase GHG emissions inventory based on the service life of a building (South Coast AQMD 2009). South Coast AQMD identified a screening-level threshold of 3,000 $MTCO_2e$ annually for all non-industrial land use developments. The bright-line screening-level criteria are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions. South Coast AQMD recommends use of the 3,000 $MTCO_2e$ interim bright-line screening-level criterion for all non-industrial project types (South Coast AQMD 2010b).

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.[6] The South Coast AQMD Working Group has identified an efficiency target for projects that exceed the screening threshold of 4.8 $MTCO_2e$ per year per service population ($MTCO_2e$/yr/SP) for project-level analyses and 6.6 $MTCO_2e$/yr/SP for plan-level projects (e.g., program-level projects such as general plans) for the year 2020.[7]

[6] South Coast AQMD had identified an efficiency target for projects that exceed the bright-line threshold: a 2020 efficiency target of 4.8 $MTCO_2e$ per year per service population ($MTCO_2e$/yr/SP) for project-level analyses and 6.6 $MTCO_2e$/yr/SP for plan-level projects (e.g., general plans). Service population is generally defined as the sum of residential and employment population of a project. The per-capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.

[7] It should be noted that the Working Group also considered efficiency targets for 2035 for the first time in this Working Group meeting.

The per-capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.[8]

As previously stated, the County has adopted the 2045 CAP, which was prepared pursuant to CEQA Guidelines Section 15183.5(b). However, use of the 2045 CAP for CEQA streamlining applies to projects in unincorporated Los Angeles and is generally not applied to County-owned properties within incorporated cities, such as the Proposed Project. This is because the population growth and emissions associated with County-owned properties in incorporated cities were not accounted for in the 2045 CAP. In addition, the County has not formally adopted a GHG emissions threshold. Thus, for purposes of this analysis, and consistent with the threshold the County elected to apply in the 2014 Master Plan EIR, the South Coast AQMD's proposed bright-line threshold of 3,000 $MTCO_2e$/yr is used to determine the Project's GHG emissions impacts. Additionally, and as stated above, the 3,000 $MTCO_2e$/yr bright-line, which is the threshold developed by South Coast AQMD to use for non-industrial land use developments is also the threshold recommended by South Coast AQMD.

METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely to occur in conjunction with future development that would be accommodated by the Proposed Project. Overall, the California Emissions Estimator Model Version 2022.1 (CalEEMod) is used to quantify Project-related construction and operation emissions.[9]

Construction

Activities, Schedule, and Equipment. Because the Proposed Project is a broad-based policy plan, how development would occur for the individual land uses accommodated under the Proposed Project over the 25-year buildout period is unknown at this time. However, for purposes of emissions modeling and this analysis, the following general methodology was used

[8] South Coast AQMD took the 2020 statewide GHG reduction target for land use only GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per-capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

[9] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials is also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

in determining the modeled construction schedule for the Proposed Project. The CalEEMod default construction durations for site preparation, grading, building construction, paving, and architectural coating activities were adjusted and normalized to an estimated 10-year development phasing that represents a hypothetical scenario in which development would occur consistently and continuously for the entire period. For demolition activities, the durations are based on preliminary estimates. In addition, although the specific timeline for individual project development is unknown, in order to present a conservative analysis of construction emissions, this analysis assumes the various construction activities (e.g., site preparation, demolition, building construction) would overlap and are given the same start date. Overall, the determined adjusted durations described above in addition to assigning the same construction start date for the construction activities result in a total modeled construction duration of 7.34 years (2,679 calendar days or 1,914 workdays) between years 2026 and 2033. Additionally, for purposes of Project-related construction emissions estimates, it is assumed vertical building construction of up to 50 percent of the proposed land uses could be occurring at any given time. Also, construction assumptions such as construction equipment mix and construction worker trips were based on CalEEMod defaults, given the programmatic nature of the Proposed Project.[10] See Table 3.2-8, *Construction Activities, Phasing, and Equipment*, of this Draft SEIR for details on the construction activities and the modeled durations and equipment mix for each of the activities.

- **Demolition.** The analysis accounts for the removal of the 28 structures identified for demolition (see Table 2-4) totaling 1,301,389 building square feet (BSF) along with demolition activities associated with the adaptive reuse of the General Hospital, which would generate 416,456 cubic yards (CY) of demolition debris. Overall, and for purpose of modeling, it assumed demolition activities associated with the General Hospital and the IRD/OPD/Parking Structure #12 area would generate 348,719 tons of demolition debris and demolition activities associated with stabilization plan would generate 95,517 tons of demolition debris material. Additionally, it is assumed all debris material would be exported to an offsite landfill.
- **Grading.** Grading associated with the Proposed Project would result in approximately 149,900 CY of fill with 44,000 CY of soil export. It is anticipated the cut material would be moved and stockpiled within the Project Site, proximate to the areas of fill. For purposes of this analysis, the amount of fill material to be moved within the Project Site is assumed to be 149,900 CY.

[10] CalEEMod default construction assumptions are based on construction surveys of various project sites conducted by South Coast AQMD (CAPCOA 2022).

Operation

- **Transportation.** The primary source of mobile-source emissions is from the combustion of fuel (i.e., gasoline and diesel). Project-related mobile-source emissions are based on calendar year 2050 CalEEMod default emissions data. Additionally, mobile emissions generated by the new proposed land uses accommodated under the Proposed Project are based on and derived from average daily trip (ADT) generation data and vehicle miles traveled (VMT) data (see Chapter 3.15, *Transportation*). Overall, the new proposed land uses are projected to generate 49,360 ADTs and 486,897 VMT per day while the existing remaining uses would generate 39,081 ADTs and 449,063 VMT per day. Overall, the new proposed land uses and the existing remaining uses with the Project Site under year 2050 buildout conditions would generate a combined 88,441 ADTs and 935,960 VMT per day. Existing uses within the Project Site under baseline year 2025 conditions are estimated to generate 45,655 ADTs and 503,279 VMT per day (see Chapter 3.15).
- **Area Sources.** Area-source emissions generated from landscaping equipment associated with property management are based on CalEEMod defaults. For hearths associated with the proposed residential uses, it is assumed the proposed dwelling units would have natural gas fireplaces. No woodburning fireplaces are assumed per South Coast Rule 445.
- **Energy.** The County may implement all-electric designs for new buildings accommodated under the Proposed Project. However, for purposes for this analysis, new buildings are assumed to be mixed-fuel buildings utilizing both electricity and natural gas and meet Title 24 standards. As modeled, the new land uses under the Proposed Project would have an annual natural gas use demand of 46,834,712 kilo-British Thermal Units per year (KBTU/yr) and an annual electricity demand of 81,276,749 kilowatt hours per year (kWh/yr). For the existing uses within the Project Site, natural gas and electricity demands are based on default CalEEMod energy rates. The default energy rates for nonresidential land uses are based on the California Energy Commission's (CEC) 2018-2030 Uncalibrated Commercial Sector Forecast (commercial forecast), which was compiled by the CEC in 2019 (CAPCOA 2022). In addition, CalEEMod default natural gas and electricity usage rates for residential uses are based the CEC Residential Appliance Saturation Study (RASS) also completed in 2019. The RASS surveyed 40,000 homes built between 1935 and 2015 with the average home constructed in 1974 (CAPCOA 2022). The natural gas and electricity demands for the existing remaining uses under year buildout year 2050 conditions would be 98,137,492 KBTU/yr and 82,878,055 kWh/yr, respectively. Overall, the combined natural gas and electricity demands for the new proposed uses and existing remaining uses within the Project Site would be 144,972,204 KBTU/yr and 164,154,805 kWh/yr, respectively. For baseline year 2025 conditions, the natural gas and electricity demand for the existing uses within the Project Site are estimated at 120,496,924 KTBU/yr and 103,374,261 kWh/yr, respectively.
- **Water/Wastewater.** GHG emissions from this sector are associated with the embodied energy used to supply water, treat water, distribute water, and then treat wastewater and

fugitive GHG emissions from wastewater treatment. Emissions are based on average annual water demand and wastewater generation associated with the proposed land uses accommodated under the Proposed Project and with the existing uses within the Project Site (see Section 3.17.4, *Utilities and Service Systems*, regarding water and wastewater demand).

- **Solid Waste.** GHG emissions from solid waste generation associated with the proposed land uses accommodated under the Proposed Project and with the existing land uses within the Project Site are based on California Department of Resources Recycling and Recovery waste generation rates (see Table 3.17-6, *Existing Solid Waste Generation*, and Table 3.17-8, *Estimated Net Increase in Solid Waste Generation*, of this Draft SEIR).
- **Refrigerants.** GHG emissions from operation of building air conditioning and refrigeration equipment are based on CalEEMod default values based on land use type.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.7.4, *Project Impact Analysis*, and 3.7.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not conflict with the CARB 2008 Scoping Plan, which was prepared to address meeting the AB 32 year 2020 statewide GHG reduction target. Thus, impacts related to project consistency with applicable GHG plans were determined to be less than significant (construction and operation) without mitigation. However, the 2014 Master Plan EIR determined that the 2014 Master Plan would result in significant and unavoidable GHG emissions impacts even with implementation of Mitigation Measure GHG-1. Overall, the 2014 Master Plan EIR estimated that the 2014 Master Plan would generate total annual GHG emissions of 66,554 $MTCO_2e$/yr and result in a net increase of 37,281 $MTCO_2e$/yr over existing. Table 3.7-5, *Summary of Greenhouse Gas Emissions Impact Conclusions in the 2014 Master Plan EIR*, provides an overview of previous greenhouse gas emissions impact analyses for the Project Site.

Table 3.7-5 Summary of Greenhouse Gas Emissions Impact Conclusions in the 2014 Master Plan EIR

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Potentially Significant (construction and operation)	MM-GHG-1	Significant and Unavoidable (construction and operation)
GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less than Significant (construction and operation)	None	Less than Significant (construction and operation)

Source: County of Los Angeles 2014

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this Draft SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2 See Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, for a complete list of mitigation measures from in the 2014 Master Plan EIR, along with proposed revisions.

3.7.4 Project Impact Analysis

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

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. Future GHG emissions may result from future development of the land uses accommodated under the Proposed Project. As stated, the potential GHG emissions impacts of the Proposed Project is evaluated to the South Coast AQMD bright line threshold of 3,000 $MTCO_2e$/yr.

CONSTRUCTION AND OPERATION

Construction of future development under the Proposed Project has the potential to generate GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific

construction activity site. In general, GHG emissions from construction activities are one-time emissions that would cease upon completion whereas operational emissions are emissions that occur on an annual basis. Per the South Coast AQMD methodology in assessing GHG emissions impacts, the construction-related GHG emissions associated with the Proposed Project are amortized into the Proposed Project's operational phase emissions inventory.

The emissions associated with the Proposed Project are comprised of emissions associated with the new proposed uses (e.g., residential, commercial/retail, office, patient and caregiver lodging, educational uses, warehouse, clean tech/industrial). Operation of the land uses included in the Proposed Project would contribute to global climate change through direct emissions of GHG from on-site area sources and vehicle trips, and indirectly through off-site energy production required for on-site activities, water use, and solid waste disposal. As detailed under the Methodology discussion, Project-generated mobile-source emissions are associated with the vehicle trips generated by the Proposed Project. The new proposed land uses are projected to generate 49,360 ADTs and 486,897 VMT per day. Area-source emissions consist of emissions generated from residential natural gas-powered fireplaces and from landscaping equipment used for property and site maintenance. Energy sector emissions would be generated from onsite combustion of natural gas used for cooking and in building heating mechanical systems and from offsite generation of grid electricity consumed by the Project for cooling and to power other systems. GHG emissions resulting from Project-related water demand and wastewater generation are associated with the embodied energy used to supply water, treat water, distribute water, and then treat wastewater and fugitive GHG emissions from wastewater treatment. The solid waste sector emissions are associated with the GHG emissions generated from decomposition of the Project-generated solid waste materials. Lastly, the Proposed Project would generate GHG emissions from refrigerants used for operation of building air conditioning and refrigeration equipment.

In addition to the operation-related sources, total construction emissions were amortized over 30 years and included in the emissions inventory to account for the short-term, one-time GHG emissions from construction of the Proposed Project. Existing structures designated for demolition generally consist of uses and facilities that do not operate independently of the larger medical campus and/or are vacant/underutilized. Many are temporary structures or vacant buildings that do not generate (or generate very limited) direct or indirect GHG emissions. Therefore, the total GHG emissions inventory associated with construction and operation of the Proposed Project (see Table 2-1 for the proposed land uses), including adaptive reuse of the General Hospital Building, is considered to represent the net change in GHG emissions from existing conditions.

The annual net change in GHG emissions resulting from full buildout of the Proposed Project are shown in Table 3.7-6, *Annual Operational Phase GHG Emissions*. As shown in the table, implementation of the Proposed Project would generate net annual GHG emissions that exceed the South Coast AQMD bright-line threshold of 3,000 $MTCO_2e$/yr. Therefore, the Proposed

Project's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

Table 3.7-6 Annual Operational Phase GHG Emissions Inventory

Sector	Full Buildout ($MTCO_2e$/yr)	Percent of Total
Mobile	95,455	58%
Area	988	1%
Energy	59,399	36%
Water/Wastewater	1,016	1%
Solid Waste	4,533	3%
Refrigerants	1,772	1%
Amortized Construction[1]	1,851	1%
Total[2]	**165,014**	**100%**
Existing Uses[3]	104,749	n/a
Net Change	**60,265**	**n/a**
South Coast AQMD Bright-line Threshold	**3,000**	**n/a**
Exceeds Threshold?	**Yes**	**n/a**

Source: CalEEMod v2022.1.

Note:

1. Total construction emissions are amortized over 30 years per South Coast AQMD methodology (South Coast AQMD 2009).
2. Represents the combined emissions associated with the proposed new land uses and the remaining existing uses within the Project Site not designated for demolition under year 2050 buildout conditions.
3. Based on the existing uses within the Project Site as they exist under current baseline year 2025 conditions.

Impact GHG-1: Implementation of the Proposed Project would result in annual GHG emissions that exceed the South Coast AQMD bright-line GHG significance threshold.

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

note the applicable measures to the County of Los Angeles Building and Safety Department prior to the issuance of construction permits.

- **Residential Structures with Three or Fewer Stories.** For residential land uses with three or fewer stories, the project developer(s) shall:
  - Design and build condominium/townhouses dwellings that have an attached private garage to have a dedicated electric circuit to support electric vehicle charging, as outlined in the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.1.
  - Design and build residential buildings to, at a minimum, meet the Tier 2 electric vehicle parking standards of the Residential Voluntary Measures of CALGreen, Division A4.1, Planning and Design, as outlined under Section A4.106.8.2.1.
- **Nonresidential Structures and Residential Structures with Four or More Stories.** For nonresidential land uses and residential land uses that are four or more stories, the Project Applicant/developer(s) shall:
  - All parking areas shall be designed to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces shall equal the Tier 2 Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.1.2.
  - Parking areas shall be designed to provide electric vehicle (EV) charging stations. At minimum, the number of EV charging stations shall comply with the Tier 2 Nonresidential Voluntary Measures of CALGreen, Division A5.1, Planning and Design, Section A5.106.5.3.3 or Section A5.106.5.3.4.

Mitigation Measure GHG-1b: Each applicant shall demonstrate a minimum 10 percent reduction in energy consumption below energy baselines. For the General Hospital, ASHRAE Standard 90.1-2010 shall be the energy baseline. For all other new construction and major renovation, the 2025 version of Title 24, Part 6 shall be the energy baseline. “New construction” in this context shall mean “ground up” development of a structure that has never been occupied. “Major renovation” in this context shall include additions to or redevelopment of existing structures resulting in an increase of over fifty (50) percent of the existing floor area. An overall energy reduction of 10 percent shall be

demonstrated on an aggregate basis across the Project Site, allowing for some buildings to perform better than others. Compliance shall be demonstrated via:

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

The technical memorandum shall be based on a project site-level energy calculation and reference Title 24 compliance forms where completed and available, and submitted to the County prior to issuance of each building permit. The 10 percent reduction in energy consumption may be achieved through a combination of Project Site-wide renewable energy generation, energy distribution systems, electrification, and/or building design features. The Project Site area energy calculations shall be based on new developments pursuant to the project. The Project Site-level energy calculations shall be updated as needed throughout phased development to reflect actual design progress. Where performance of an individual building or phase is below the 10 percent requirement, it will address anticipated performance in future phases to achieve the aggregate 10 percent reduction.

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

Mitigation Measure GHG-1c: For nonresidential development projects, prior to issuance of the certificate of occupancy, the property owner shall provide documentation to the County of Los Angeles Building and Safety Department demonstrating enrollment in a 100 percent carbon-free electricity energy plan, such as the City of Los Angeles

Department of Water and Power's Green Power for Green LA program, for Proposed Project building(s) if such plan is available. If a 100 percent carbon-free electricity plan is not available, the project developer(s)/County shall enroll in an energy plan with the next highest carbon-free electricity until a 100 percent carbon-free electricity energy plan becomes available. Measures to achieve 100 percent carbon-free electricity use may include, but are not limited to, plans for 100 percent renewable electricity. If such carbon-free electricity energy plans are waitlisted, the Project Applicant(s) may enroll in an available energy plan in the meantime, but shall sign up for the waiting list until such time a carbon-free electricity energy plan is available.

In addition to the topic-specific mitigation measures identified above, the Proposed Project would also implement the following mitigation measure:

Mitigation: Implement Mitigation Measure TRA-3d.

Significance with Mitigation: Significant and unavoidable. Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d could reduce GHG emissions impacts associated with future individual development activities under the Proposed Project to a less than significant level. Mitigation Measure TRA-3d would require the implementation of a Transportation Demand Management program to reduce vehicular trips to the Project Site. However, because the specifics of the potential future development projects accommodated under the Proposed Project are unknown, it is uncertain whether all future development activities would be shown to generate GHG emissions below the South Coast AQMD bright-line threshold of 3,000 $MTCO_2e$/yr even with the identified reduction measures implemented. Additionally, while implementation of mitigation would contribute to minimizing overall Project-related GHG emissions, it is anticipated that the Proposed Project would still exceed the South Coast AQMD bright-line threshold of 3,000 $MTCO_2e$/yr due to the magnitude of development accommodated under the Proposed Project. Therefore, Impact GHG-1 would remain **significant and unavoidable**.

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

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's 2022 Scoping Plan, SCAG's 2024-250 RTP/SCS, and the County's 2045 CAP. A consistency analysis with these plans is presented below:

Construction and Operation

CARB Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations adopted by the State agencies result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction's emissions inventory from the top down.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed land uses accommodated under the Proposed Project would comply with these GHG emissions reduction measures since they are statewide strategies. In addition, as explained above, the 2022 Scoping Plan expands on prior Scoping Plans and recent legislations, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier (CARB 2022). To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes, reduction of short-lived climate pollutants, and mechanical carbon dioxide capture and sequestration actions.

Table 3.7-7, *Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of the GHG-reducing strategies from the 2022 Scoping Plan. The analysis describes the Proposed Project's compliance and consistency with these strategies. As shown in the table, the Proposed Project would not conflict with applicable 2022 Scoping Plan strategies and regulations to reduce GHG emissions.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
Transportation Technology Sector		
▪ Achieve 100 percent ZEV sales of light duty vehicles by 2035 and medium heavy-duty vehicles by 2040. ▪ Achieve 20 percent zero-emission target for the aviation sector. ▪ Develop a rapid and robust network of ZEV refueling infrastructure to support needed transition to ZEVs. ▪ Ensure that the transition of ZEV technology is affordable for low-income households and communities of color, and meets the needs of communities and small business. ▪ Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions. ▪ Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity and hydrogen station grants from the CEC's Clean Transportation Program pursuant to Executive Order B-48-18. ▪ Evaluate and continue to offer incentives similar to those through FARMER, Carl Moyer, the Clean Fuel Reward Program, the Community Air Protection Program, the Low Carbon Transportation, including CORE. Where feasible, prioritize and increase funding for clean transportation equity programs.	State and local agencies	**No Conflict.** Vehicles must transition to ZE technology to decarbonize the transportation sector. Executive Order N-79-20 reflects the urgency of transitioning to zero emission vehicles (ZEVs) by establishing target dates for reaching 100 percent ZEV sales or fleet transitions to ZEV technology. EO N-79-20 calls for 100 percent ZEV sales of new light-duty vehicles by 2035. It also sets targets for transitioning the medium- and heavy-duty fleet to zero emissions: by 2035 for drayage trucks and by 2045 for buses and heavy-duty long-haul trucks where feasible. Replacing heavy-duty vehicles with ZEV technology will significantly reduce GHG emissions and diesel PM emissions in low-income communities and communities of color adjacent to ports, distribution centers, and highways. ACC II and Advanced Clean Trucks regulations are currently nullified due to the recent US Congressional actions taken under H.J Resolutions 87 and 88. However, A number of existing incentive programs are available support this transition, including the Clean Cars 4 All Program, in addition to the FARMER, Carl Moyer, and Community Air Protection Incentives, and the Low Carbon Transportation Incentives, including the Clean Off-Road Equipment (CORE) program. Refueling infrastructure is a crucial component of transforming transportation technology. Electric vehicle chargers and hydrogen refueling stations must become easily accessible

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector.		for all drivers to support a wholesale transition to ZEV technology. Deployment of ZEV refueling infrastructure is currently supported by a number of existing local and state public funding mechanisms. Intrastate aviation relies on ICE technology today, but battery-electric and hydrogen fuel cell aviation applications are in development, along with sustainable aviation fuel. While these actions and strategies apply to state and local agencies and does not directly apply to land used development planning projects, the standards would apply to all vehicles purchased or used by occupants, vendors, and visitors of the County and Proposed Project. Future development accommodated by the Proposed Project would be required to comply with the County Municipal Code and CALGreen requirements regarding the number of electric vehicle-ready and electric vehicle-capable parking spaces to support ZEVs and PHEVs. As such, the Proposed Project is consistent with implementation of this strategy.
Transportation Fuels Sector		
▪ Accelerate the reduction and replacement of fossil fuel production and consumption in California. ▪ Incentivize private investment in new zero-carbon fuel production in California. ▪ Incentivize the transition of existing fuel production and distribution assets to support deployment of low and zero-carbon fuels while protecting public health and the environment.	State and local agencies	**No Conflict.** The state must continue to support low-carbon liquid fuels during this period of transition and for much harder sectors for ZEV technology such as aviation, locomotives, and marine applications. Biomethane currently displaces fossil fuels in transportation and will largely be needed for hard-to-decarbonize sectors, but will likely continue to play a targeted role in some fleets while the transportation sector

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Invest in the infrastructure to support reliable refueling for transportation such as electricity and hydrogen refueling. ▪ Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. o Initiate a public process focused on options to increase the stringency and scope of the LCFS: o Evaluate and propose accelerated carbon intensity targets pre-2030 for LCFS. o Evaluate and propose further declines in LCFS post-2030 carbon intensity targets to align with this 2022 Scoping Plan. o Consider integrating opt-in sectors into the program. o Provide capacity credits for hydrogen and electricity for heavy-duty fueling. ▪ Monitor for and ensure that raw materials used to produce low-carbon fuels or technologies do not result in unintended consequences		transitions to ZEVs. Private investment in alternative fuels will play a key role in diversifying the transportation fuel supply away from fossil fuels. EO N-79-20 calls on state agencies to support the transition of existing fuel production facilities away from fossil fuels and directs that this transition also protect and support workers, public health, safety, and the environment. In line with this direction, existing refineries could be repurposed to produce sustainable aviation fuel, renewable diesel, and hydrogen. While these actions and strategies apply to state and local agencies, GHG emissions generated by passenger and truck vehicular travel as a result of future development facilitated by the Proposed Project would benefit from the above regulations and programs, and mobile source emissions would be reduced with implementation, and mobile source emissions generated by future development facilitated by adoption of the Proposed Project would be reduced with implementation of the wider use of zero-carbon fuels consistent with reduction of GHG emissions under AB 1279. In addition, the proposed Mobility Hub would include bus charging infrastructure. Thus, the Proposed Project would be consistent with actions in the transportation fuels sector
Vehicle Miles Traveled Sector		
▪ Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.	State and local agencies	**No Conflict.** Managing total demand for transportation energy by reducing the miles people need to drive on a daily basis is critical as the state aims for a

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Reimagine new roadway projects that decrease VMT in a way that meets community needs and reduces the need to drive. ▪ Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience. ▪ Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices ▪ Expand and complete planned networks of high quality active transportation infrastructure. ▪ Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT impact service models that complement transit and ensure equitable access for priority populations. ▪ Streamline access to public transportation through programs such as the California Integrated Travel Project. ▪ Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop		sustainable transportation sector in a carbon neutral economy. VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals. CARB did not set regulatory limits on VMT in the 2022 Scoping Plan because the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices. While these actions and strategies apply to state and local agencies, SB 375 requires SCAG to direct the development of the RTP/SCS for the region. The Proposed Project would be consistent with the RTP/SCS goal to adapt to a changing climate and to support an integrated regional development pattern. Zonal Avenue, Marengo Street, and Mission Road are designated high quality transit corridors (HQTC). Overall, the Proposed Project would result in in-fill mixed-use land uses, which include a variety of land use types such as residential, office, commercial, educational, and retail along these designated HQTCs. Additionally, the Proposed Project includes a Mobility Hub that could include such features as enhancing local and regional bus connectivity, providing for an internal campus shuttle, bicycle parking stations, and pedestrian network and bicycle circulation improvements that provide connectivity of the Project Site to the larger

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
tools to support implementation of these plans. ▪ Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower income residents.		surrounding communities. As a result of the proposed uses, the location of the Project Site in a high quality transit area (HQTA), and the VMT-reducing elements of the Proposed Project, and as supported in Section 3.15, *Transportation*, of this Draft SEIR, VMT impacts would be less than significant. Therefore, the Proposed Project would be consistent with the actions of the VMT sector.
Clean Electricity Grid Sector		
▪ Use long-term planning processes (Integrated Energy Policy Report, IRP, CAISO Transmission Planning Process, AB 32 Climate Change Scoping Plan) to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment. ▪ Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, statewide and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets. ▪ Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state's decarbonization roadmap for adjustments as may be needed. ▪ Facilitate long lead-time resource development through the IRP and the SB 100 interagency process and through technology development and demonstration funding that includes	State and local agencies	**No Conflict.** Fossil gas is the primary gaseous fossil fuel used to produce heat at industrial facilities, as well as in residential and commercial buildings. Gaseous fossil fuel use can be displaced by four primary alternatives: zero-carbon electricity, solar thermal heat, hydrogen, and biogas/biomethane. The 2022 Scoping Plan reduces dependence on fossil gas in the industrial and building sectors by transitioning substantial energy demand to alternative fuels. Combustion of fossil gas, other gaseous fossil fuels, and solid fossil fuels provide energy to meet three broad industry needs: electricity, steam, and process heat. Non-combustion emissions result from fugitive emissions and from the chemical transformations inherent to some manufacturing processes. About 20 percent of the GHG emissions from the industrial sector are non-combustion emissions. Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
resources such as long-duration energy storage and hydrogen production. ▪ Continue coordination between energy agencies and energy proceedings to maximize opportunities for demand response. ▪ Continue to explore the benefits of regional markets to enhance decarbonization, reliability, and affordability. ▪ Address resource build-out challenges, including permitting, interconnection, and transmission network upgrades. ▪ Explore new financing mechanisms and rate designs to address affordability. ▪ Per SB 350, double statewide energy efficiency savings in electricity and fossil gas end uses by 2030, through a combination of energy efficiency and fuel substitution actions. ▪ Per SB 100 and SB 1020, achieve 90 percent, 95 percent, and 100 percent renewable and zero-carbon retail sales by 2035, 2040, and 2045, respectively. ▪ Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. ▪ Target programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community-owned or controlled solar or wind, battery storage, and microgrids) for communities most at need, including frontline, low-income, rural, and indigenous communities. ▪ Prioritize public investments in zero-carbon energy projects to first benefit the most overly burdened communities		carbon hydrogen, and other low carbon fuels to provide energy for heat and reduce combustion emissions. Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion CO_2 emissions can be captured and sequestered. This sector has a continuing demand for fossil gas due to lack of non-combustion technologically feasible or cost effective alternatives for certain industrial sectors. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities. The future development activities accommodated under the Proposed Project would be required to comply with the Building Energy Efficiency Standards and CALGreen. The current 2025 Building Energy Efficiency Standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, it also includes prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Furthermore, the proposed would include new high-efficiency

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
affected by pollution, climate impacts, and poverty.		modern technology energy infrastructure, resulting in high-efficiency use and transmission of energy sources to the proposed new uses. This represents a substantial improvement from the existing inefficient Central Utility Plant. Thus, the Proposed Project would be consistent with actions in the clean electricity grid sector.
Sustainable Manufacturing and Buildings Sector		
▪ Prioritize California's most vulnerable residents with the majority of funds in the new $922 million Equitable Building Decarbonization program, created through the 2022–2023 state budget. This would include residents in frontline, low-income, disadvantaged, rural, and tribal communities. This program is dedicated to a statewide direct-install building retrofit program for low-income households to replace fossil fuel appliances with electric appliances, energy-efficient lighting, and building insulation and sealing while also coordinating reductions in gas infrastructure in specific geographic areas. ▪ Achieve three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030. ▪ Expand incentive programs to support the holistic retrofit of existing buildings, especially for vulnerable communities. ▪ Ensure that incentive programs prioritize energy affordability and tenant protections, promote affordable	State and local agencies	**No Conflict**. Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings and will rely primarily on advancing energy efficiency while replacing gas appliances with non-combustion alternatives. This transition must include the goal of trimming back the existing gas infrastructure, so pockets of gas-fueled residential and commercial buildings do not require ongoing maintenance of the entire limb for gas delivery. Blending low carbon fuels such as hydrogen and biomethane into the pipeline further displaces fossil gas. Pipeline safety and reliability must be evaluated to accommodate low-carbon fuels. This transition is achieved when all new buildings constructed include non-combustion appliances, and appliances in existing buildings are replaced at the end of their useful life with non-combustion alternatives. While these actions and strategies apply to state and local agencies, as stated above, future development activities under the Proposed Project would be

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
and low-income household retrofits that improve habitability and reduce expenses, protect and empower small landlords and homeowners, address overlooked consumer groups, and pair decarbonization with other critically needed renovation efforts to ensure that buildings support human health and are climate- and weather-resistant. ▪ End fossil gas infrastructure expansion for newly constructed buildings. ▪ Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program. ▪ Strengthen California's building standards to support zero-emission new construction. ▪ Develop building performance standards for existing buildings. ▪ Adopt a zero-emission standard for new space and water heaters sold in California beginning in 2030, as specified in the 2022 State Strategy for the State Implementation Plan. ▪ Expand use of low-GWP refrigerants within buildings. ▪ Support electrification with changes to utility rate structures and by promoting load management programs. ▪ Increase funding for incentive programs and expand financing assistance programs focused on existing buildings and appliance replacements. ▪ Expand consumer education efforts to raise awareness and stimulate the adoption of decarbonized buildings and appliances, especially in vulnerable communities.		required to comply with applicable statewide, regional, or local top-down rules, and regulations regarding fossil fuel use. The land use development projects accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include electric-ready requirement for mix-fueled single-family homes. Additionally, it also includes prescriptive PV system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Thus, the Proposed Project would be consistent with actions in the sustainable manufacturing and buildings industry sector.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Implement biomethane procurement targets for investor-owned utilities as specified in SB 1440 (Hueso, Chapter 739, Statutes of 2018) to reduce GHG emissions in remaining pipeline gas and reduce methane emissions from organic waste.		
Carbon Dioxide Removal and Capture Sector		
▪ Implement SB 905. ▪ Convene a multi-agency Carbon Capture and Sequestration Group comprised of federal, state, and local agencies to engage with environmental justice advocates, tribes, academics, researchers, and community representatives to identify the current status, concerns, and outstanding questions concerning carbon capture and storage (CCS), and develop a process to engage with communities to understand specific concerns and consider guardrails to ensure safe and effective deployment of CCS. ▪ Iteratively update the CARB CCS Protocol with the best available science and implementation experience. ▪ Incorporate CCS into other sectors and programs beyond transportation where cost-effective and technologically feasible options are not currently available and to achieve the 85 percent reduction in anthropogenic sources below 1990 levels as called for in AB 1279. ▪ Evaluate and propose, as appropriate, financing mechanisms and incentives to address market barriers for CCS and carbon dioxide removal (CDR).	State and local agencies	**No Conflict**. The deployment of carbon dioxide removal (CDR) to counterbalance hard-to-abate residual emissions is unavoidable if net zero CO_2 or GHG emissions are to be achieved. Modeling shows that emissions from the AB 32 GHG Inventory sources will continue to persist even if all fossil related combustion emissions are phased out. These residual emissions must be compensated for to achieve carbon neutrality wither with CDR, which includes both sequestration in natural and working lands and mechanical approaches like direct air capture, CCS, which is carbon capture from anthropogenic point sources involves capturing carbon from a smokestack of an emitting facility, or direct air capture, which captures carbon directly from the atmosphere. The Proposed Project would not conflict with measures to increase carbon dioxide removal and capture. In addition, future development activities accommodated under the Proposed Project would comply with any future applicable statewide CCS or CRD regulations.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Evaluate and propose, as appropriate, the role for CCS in cement decarbonization (SB 596) and as part of hydrogen production pathways (SB 1075). ▪ Support carbon management infrastructure projects through core CEC research, development, and demonstration (RD&D) programs. ▪ Continue to explore carbon capture applications for producing or leveraging zero-carbon power for reliability needs as part of SB 100. ▪ Consider carbon capture infrastructure when developing hydrogen roadmaps and strategy, especially for non-electrolysis hydrogen production. ▪ Evaluate and streamline permitting barriers to project implementation while protecting public health and the environment. ▪ Explore options for how local air quality benefits can be achieved when CCS is deployed. ▪ Explore opportunities for CCS and CDR developers to leverage existing infrastructure, including subsurface infrastructure. ▪ Explore permitting options to allow for scaling the number of sources at carbon sequestration hubs.		
Short-Lived Climate Pollutants (Non-Combustion Gases) Dairy and Livestock Methane Sector		
▪ Install state-of-the-art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to	State and local agencies	**No Conflict**. Short-Lived Climate Pollutants (SLCPs) include black carbon, methane, and fluorinated gases. HFCs are the fastest growing source of GHG emissions, primarily driven by their use to replace ozone-depleting substances

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
decarbonize or as a feedstock for energy. ▪ Increase alternative manure management projects, including but not limited to conversion to "solid," "dry," or "scrape" manure management; installation of a compost-bedded pack barn; an increase in the time animals spend on pasture; and implementation of solid-liquid separation technology into flush manure management systems. ▪ Implement enteric fermentation strategies that are cost-effective, scientifically proven, safe for animal and human health, and acceptable to consumers, and that do not impact animal productivity. Provide financial incentives for these strategies as needed. ▪ Accelerate demand for dairy and livestock product substitutes such as plant-based or cell-cultured dairy and livestock products to achieve reductions in animal populations. ▪ In consideration of the pace of deployment of methane mitigation strategies and the scale of complementary incentives, consider regulation development to ensure that the 2030 target is achieved, assuming the conditions outlined in SB 1383 are met.		and an increased demand for cooling and refrigeration. Dairy and livestock are the largest source of methane emissions followed by landfills. Black Carbon, soot, comes primarily from transportation, specifically heavy-duty vehicles followed by fuel combustion for residential, commercial, and industrial applications. The Proposed Project does not include dairy or livestock and would not conflict with this sector.
Short-Lived Climate Pollutants (Non-Combustion Gases) Landfill Methane Sector		
▪ Maximize existing infrastructure and expand it to reduce landfill disposal, with strategies including composting, anaerobic digestion, co-digestion at wastewater treatment plants, and	State and local agencies	**No Conflict**. SB 1383 has a 75 percent organic waste disposal reduction target below the 2013 baseline by 2030. The state did not achieve the 50 percent reduction in organic waste disposal

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
other non-combustion conversion technologies. ▪ Expand markets for products made from organic waste, including through recognition of the co-benefits of compost, biochar, and other products. ▪ Recover edible food to combat food insecurity. ▪ Invest in the infrastructure needed to support growth in organic recycling capacity. ▪ Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity. ▪ Direct biomethane captured from landfills and organic waste digesters to sectors that are hard to decarbonize. ▪ Implement improved technologies and best management practices at composting and digestion operations. ▪ Reduce emissions from landfills through improvements in operational practices, lower permeability covers, advanced collection systems, and technologies to utilize landfill gas. ▪ Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks, improve understanding of the factors that lead to better capture efficiency, and explore new technologies and practices that can reliably improve methane control at landfills.		below 2014 levels by 2020. The CPUC approved a decision in February 2022 implementing the biomethane procurement program, which will require investor-owned utilities by 2025 to procure 17.6 billion cubic feet (BCF) of biomethane produced from organic wastes to support the landfill disposal reduction and SLCP target and reduce fossil gas reliance for residential and commercial customers. Organic waste will also be reduced by measure to remove edible food from the stream. Emissions can also be reduced by improvements in operational practices at landfills including lower permeability covers, advanced landfill gas collection systems, and increased monitoring to detect and repair leaks. The Proposed Project does not include development of any landfill operations. In addition, the Proposed Project would comply with the waste diversion requirements under Division 4.4 of CALGreen, the recycling mandates for commercial and multifamily residential uses under AB 341, the organic waste recycling mandates under AB 1826, and the diversion requirements under the Los Angeles County Code of Ordinances Chapter 20.87. Thus, the Proposed Project would not conflict with SLCP landfill methane sector actions in the 2022 Scoping Plan.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
Short-Lived Climate Pollutants (Non-Combustion Gases) Upstream Oil and Gas Methane Sector		
▪ Mitigate emissions from leaks by regular leak detection and repair (LDAR) surveys at all facilities. ▪ Replace high-emitting equipment with zero-emission alternatives wherever feasible. ▪ Have CARB and CalGEM lead a Task Force to identify and address methane leaks from oil infrastructure near communities. ▪ Pursuant to SB 1137, develop leak detection and repair plans for facilities in health protection zones, implement emission detection system standards, and provide public access to emissions data. ▪ Minimize emissions from equipment that must vent fossil gas by design (e.g., fossil gas-powered compressors). ▪ Install vapor collection systems on high-emitting equipment. ▪ Phase out venting and routine flaring of associated gas (gas produced as a by-product during oil production). ▪ Implement continuous ambient monitoring at fossil gas underground storage facilities to quickly detect large methane sources. ▪ Reduce pipeline and compressor blowdown emissions. ▪ Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks.	State and local agencies	**No Conflict**. California is currently on track to achieve a 41 percent reduction in methane emissions from oil and gas production by 2025 relative to 2013. To meet the 2030 target, regulatory requirements to further reduce intentional venting of fossil gas from equipment are needed. The Proposed Project does not include any oil or gas production. Thus, the Proposed Project would not conflict with SLCP upstream oil and gas methane sector actions in the 2022 Scoping Plan.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
Short-Lived Climate Pollutants (Non-Combustion Gases) Hydrofluorocarbons Sector		
▪ Expand the use of very low- or no-GWP technologies in all HFC end-use sectors, including emerging sectors, like heat pumps for applications other than space conditioning, to maximize the benefits of building decarbonization. ▪ Convert large HFC emitters such as existing refrigeration systems to the lowest practical GWP technologies. ▪ Prioritize small-scale and independent grocers serving priority populations in addressing existing "banks" of high-GWP refrigerants. ▪ Improve recovery, reclamation, and reuse of refrigerants by limiting sales of new or virgin high-GWP refrigerants and requiring the use of reclaimed refrigerants where appropriate. ▪ Assist low-income and disadvantaged communities in obtaining low-GWP space conditioning units to protect vulnerable communities from heat stress and wildfire smoke. ▪ Accelerate technology transitions in California and the U.S. overall by collaborating with international partners committed to taking action on HFCs under the Kigali Amendment to the Montreal Protocol; this includes addressing barriers to adoption of very low- or no-GWP refrigerant technologies such as high upfront costs, shortage of trained technicians, and lag in updating safety standards and building codes.	State and local agencies	**No Conflict.** New targeted measures are needed to reduce HFCs, primarily from high-GWP refrigerants, to meet 2045 requirements. HFC emissions from new and existing sources need to be addressed in tandem with building decarbonization efforts to maximize reductions. The adoption of low-GWP refrigerants must occur in parallel with building decarbonization efforts. The sales prohibitions on newly produced refrigerants set forth in SB 1206 and the national/international HFC phasedown will help in reducing HFC emissions from existing equipment by restricting the supply of and increasing the value of existing high-GWP HFCs. While these actions and strategies apply to state and local agencies, the Proposed Project would be consistent with SLCP hydrofluorocarbons sector actions in the 2022 Scoping Plan. These regulations would be applicable to future development activities accommodated under the Proposed Project to the extent that new development would use these regulated compounds in accordance with regulations. Any such future development would be required to comply with applicable regulations from this CARB Short-Lived Climate Pollutants reduction strategy, with respect to adopted limits on the use of regulated compounds for refrigeration uses. Therefore, the Proposed Project would be consistent with this strategy.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
Short-Lived Climate Pollutants (Non-Combustion Gases) Anthropogenic Black Carbon Sector		
▪ Reduce fuel combustion commensurate with state's climate and air quality programs, particularly from reductions in transportation emissions and agricultural equipment emissions. ▪ Invest in residential wood smoke reduction.	State and local agencies	**No Conflict**. Under current strategies, anthropogenic black carbon from transportation is expected to be reduced by over 60 percent in 2030. Continued reductions in combustion emissions across all sectors from both the state's climate and air quality programs will also reduce anthropogenic black carbon emissions. While these actions and strategies apply to state and local agencies, the Proposed Project would be consistent with SLCP anthropogenic black carbon sector actions in the 2022 Scoping Plan. As discussed above, the Proposed Project would result in infill development along or near designated HQTCs involving a mix of land use types that includes residential, retail, office, educational, commercial, hospital, and hospitality, and result in improved connectivity and VMT-reducing features. Furthermore, as shown in Table 3.15-4, *Proposed Project VMT Measured Against Existing Countywide VMT*, of Chapter 3.15 of this Draft SEIR, the Proposed Project would result in a residential and work VMT per capita that are less than the County-wide averages. Thus, the Proposed Project would not interfere, impede, or conflict with the strategies of this sector.
Natural and Working Lands: Strategies for all NWL		
▪ Implement AB 1757 and SB 27. ▪ Implement the Climate Smart Strategy. ▪ Accelerate the pace and scale of climate smart action, consistent with	State and local agencies	**No Conflict**. AB 1757 calls for the development of an ambitious range of targets for the NWL sector to be integrated into the Scoping Plan and

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
the management levels identified above, as part of a collective effort between federal, state, private, nonprofit, and individual land managers. ▪ Prioritize and practice equity, including through meaningful community engagement and prioritizing implementation of nature-based solutions that benefit the communities most vulnerable to climate change. ▪ Advance multi-benefit, collaborative, landscape-level approaches that engage communities and landowners, and incorporate adaptive management. ▪ Consult and partner with California Native American tribes to increase co-management and tribal management authority; restore, protect, and enhance natural cultural resources, traditional foods, and cultural landscapes; respect tribal sovereignty; and support tribes' implementation of tribal expertise and Traditional Ecological Knowledge and cultural easements. ▪ Leverage existing innovative financial and market mechanisms, and explore new ones, between the public, private, and philanthropic sectors to secure funding of climate smart land management. ▪ In partnership with communities, tribes, and the private sector, expand and develop new infrastructure for manufacturing and processing of climate smart agricultural and biomass products.		other state policies. SB 27 directed CARB to establish CO_2 removal targets for 2030 and beyond. In response to EO N-82-20 and AB 1757, the proposed target for NWL for 2045 is a -4 percent change in total carbon stock from 2014. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the Project Site. Thus, this strategy is not directly related to future development accommodated under the Proposed Project. The Proposed Project would not interfere, impede, or conflict with NWL strategies for all NWL actions under the 2022 Scoping Plan.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Leverage and support technical assistance providers such as the UC Cooperative Extension and California's 98 Resource Conservation Districts, that have track records of providing technical assistance to local landowners and implementing agriculture, forestry, natural resource management, and restoration projects across the state. ▪ Establish and expand mechanisms that ensure NWL are protected from land conversion and parcelization (e.g., conservation easements or Williamson Act), in line with the strategies outlined in CNRA's Pathways to 30x30 California. Pair land conservation projects with management plans that increase carbon sequestration, where feasible. ▪ Increase opportunities for private and philanthropic investments in nature-based climate solutions, utilizing existing voluntary and compliance carbon markets, existing state and local programs, and the California Carbon Sequestration and Climate Resiliency Project Registry established pursuant to SB 27. ▪ Expand monitoring and tracking of management actions and outcomes consistent with the tracking and monitoring recommendations of the Climate Smart Strategy.		
Natural and Working Lands: Forest Shrublands and Chaparral		
▪ Accelerate the pace and scale of climate-smart forest management to at least 2.3 million acres annually by 2025, in line with the climate-smart management strategies identified in this Scoping Plan, the NWL Climate	State and local agencies	**No Conflict**. California is covered by 27 percent forests and 31 percent shrublands and chaparral. Climate smart management can help make forests more resilient to climate change and less prone to catastrophic wildfire. Climate-

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
Smart Strategy, and the Wildfire and Forest Resilience Action Plan. ▪ Establish and expand mechanisms that ensure forests, shrublands, and grasslands are protected from land conversion and that support ongoing, rather than one-time, management actions. ▪ In collaboration with state and local agencies, accelerate the deployment of long-term carbon storage from waste woody biomass residues resulting from climate-smart management, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums. ▪ Expand infrastructure to facilitate processing of biomass resulting from climate-smart management. ▪ Expand permit streamlining in collaboration with state and local agencies to accelerate implementation of climate-smart forest management while protecting natural resources. ▪ Natural and Working Lands: Grasslands ▪ Establish and expand mechanisms that ensure grasslands are protected from land conversion/parcelization and that support ongoing, rather than one-time, management actions that improve carbon sequestration. ▪ Deploy grassland management strategies, like prescribed grazing, compost application, and other regenerative practices, to support soil carbon sequestration, biodiversity, and other ecological improvements. ▪ Increase adoption of compost production on farms and application of		smart management in shrublands and chaparral face can provide protection for threatened communities and natural resources. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the Project Site. Thus, this strategy is not directly related to future development activities accommodated under the Proposed Project. The Proposed Project would not interfere, impede, or conflict with strategies on any NWL where forests, shrublands, and chaparral occur under the 2022 Scoping Plan.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
compost in appropriate grassland settings for improved vegetation and carbon storage, and to deliver waste diversion goals through nature-based solutions.		
Natural and Working Lands: Croplands		
▪ Accelerate the pace and scale of healthy soils practices to 80,000 acres annually by 2025, conserve at least 8,000 acres of annual crops annually, and increase organic agriculture to 20 percent of all cultivated acres by 2045. ▪ Utilize the recommendations included in CDFA's Farmer and Rancher-Led Climate Change Solutions report to accelerate the deployment of healthy soils practices, organic farming, and climate-smart agriculture practices. ▪ Establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture. ▪ Support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems, such as implementing the California Department of Pesticide Regulation's (DPR's) Sustainable Pest Management Work Group recommendations. ▪ Conduct research on the intersection of pesticides, soil health, GHGs, and pest resiliency via a multi-agency effort with DPR, CDFA, and CARB. ▪ Conduct outreach and education to develop and facilitate the increased adoption of safer, more sustainable pest management practices and tools;	State and local agencies	**No Conflict.** Climate smart practices can maintain or increase the climate resilience of cropland productivity through improved soil conditions and increased pollinator habitat. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the Project Site. Thus, this strategy is not directly related to future development activities accommodated under the Proposed Project. The Proposed Project would not interfere, impede, or conflict with strategies on any NWL where croplands occur under the 2022 Scoping Plan.

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
reduce the use of harmful pesticides; promote healthy soils; improve water and air quality; and reduce public health impacts. ▪ In collaboration with state and local agencies, accelerate the deployment of alternatives to agricultural burning that increase long-term carbon storage from waste agricultural biomass, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums. ▪ Work across state agencies to reduce regulatory and permitting barriers around some healthy soils practices (e.g., composting), where appropriate. ▪ Utilize innovative agriculture energy use and carbon monitoring and planning tools to reduce on-farm GHG emissions from energy and fertilizer application or to increase carbon storage, as well as to promote on-farm energy production opportunities.		
Natural and Working Lands: Wetlands		
▪ Restore 60,000 acres of Delta wetlands annually by 2045 to reduce methane emissions from wetlands and reverse the resulting subsidence. ▪ Identify and prioritize wetland restoration efforts around climate vulnerable communities. ▪ Leverage other funding and institutions to support wetland restoration projects, including land trusts, local funding, federal funding, and private and philanthropic funding to support wetlands restoration projects.	State and local agencies	**No Conflict**. Wetlands are hotspots for diversity, contain considerable carbon in the soil, are critical to the states' water supply, and protect upland areas from flooding due to sea level rise and storms. Climate smart strategies to restore and protect wetlands can reduce emissions while simultaneously improving the climate resilience of surrounding areas and improving the water quality and yield for the state. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
▪ Work across state agencies to reduce regulatory and permitting barriers around wetland restoration projects, where appropriate.		Community Plan area. Thus, this strategy is not directly related to future development activities accommodated under the Proposed Project. The Proposed Project would not interfere, impede, or conflict with strategies on any NWL where wetlands occur under the 2022 Scoping Plan.
Natural and Working Lands: Developed Lands		
▪ Increase urban forestry investment annually by 200 percent, relative to business as usual. ▪ Increase public awareness of urban forest benefits and, where appropriate, prioritize irrigation of trees over lawns. ▪ Provide technical assistance and resources to disadvantaged communities to implement community urban greening projects to provide equitable access to the benefits of urban greening projects. ▪ Work with state and local agencies to expand technical assistance for and enforcement of the defensible space requirements of PRC 4291 to reduce wildfire risk to homes and structures.	State and local agencies	**No Conflict**. Developed lands include urban, suburban, and rural areas, as well as transportation and supporting infrastructure. The vegetation within cities and communities are all part of developed lands. This vegetation provides numerous benefits to surrounding areas, including carbon storage, air and water filtration, reduced urban heat island effect, and access to nature, Climate smart strategies to protect and expand the urban forests, landscaping, green spaces, parks, and associated vegetation can increase their climate resilience and the benefits Californians derive from them. Urban forests have a significant potential to sequester carbon. Shade trees would be included as part of the proposed pedestrian circulation improvements under the Proposed Project. Thus, the Proposed Project would not interfere, impede, or conflict with any NWL developed lands strategies of the 2022 Scoping Plan.
Natural and Working Lands: Vegetated Lands		
▪ Establish and expand mechanisms that ensure sparsely vegetated lands are	State and local agencies	**No Conflict**. Vegetated lands include deserts, beaches, dunes, bare rock, and

Table 3.7-7 Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies

2022 Scoping Plan Actions and Strategies	Responsible Party(ies)	Consistency
protected from land conversion, prioritizing those areas most vulnerable to climate change and loss.		areas covered in ice and snow. Vegetated lands provide limited carbon storage, but nonetheless, are important for open space, unique habitats, and recreational opportunities. While these actions and strategies apply to state and local agencies, there are no Natural and Working Lands in the Project Site, which is fully developed and built out. Thus, this strategy is not directly related to future development facilitated by adoption of the Proposed Project, which would not interfere, impede, or conflict with strategies on any NWL where vegetated lands occur under the 2022 Scoping Plan.

Source: CARB 2022.

SCAG RTP/SCS

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The regional transportation network envisioned in Connect SoCal would reduce per-capita GHG emissions related to vehicular travel associated with the Proposed Project and assist in meeting the GHG reduction per capita targets for the SCAG region (SCAG 2024).

The Connect SoCal Plan does not require that local general plans, proposed projects, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The purpose of the 2024–2050 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2024–2050 RTP/SCS, certified on May 7, 2020, states that "[e]ach [metropolitan planning organization] is required to prepare an SCS as part of their RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375" (SCAG 2024). The 2024–2050 RTP/SCS seeks improved mobility and accessibility, which is defined as "the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices" (SCAG 2024) The 2024–2050 RTP/SCS seeks to implement a strategy that "alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation" (SCAG 2024). Furthermore, the 2024–2050 RTP/SCS includes "more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth" and "accommodate increases in population, households, employment, and travel demand" (SCAG 2024). Moreover, the 2024–2050 RTP/SCS states that while "[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region," the RTP/SCS would focus "growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions" (SCAG 2024).

Table 3.7-8, *Consistency with 2024–2050 SCAG RTP/SCS Goals*, evaluates the Proposed Project's consistency with the strategies and policies in the 2024–2050 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as SCAG's 2024–2050 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As shown in the table, the Proposed Project would not conflict with the 2024–2050 RTP/SCS goals. In addition, as shown in Table 3.15-4, *Proposed Project VMT Measured Against Existing Countywide VMT*, of Chapter 3.15 of this Draft SEIR, the Proposed Project would result in residential VMT per capita and work VMT per employee that are 54 percent and 26 percent, respectively, less than the County-wide averages.

Table 3.7-8 Consistency with Applicable SCAG 2024-2050 RTP/SCS Goals

2024-2050 RTP/SCS Goals	2024-2050 RTP/SCS Subgoals	Consistency
Mobility: Build and maintain an integrated multimodal transportation network.	▪ Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. ▪ Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. ▪ Support planning for people of all ages, abilities and backgrounds.	**Consistent.** The Proposed Project includes a Mobility Hub that could include such features as enhancing local and regional buses and the internal campus shuttle, providing bicycle parking stations, rideshare drop-offs, and a fleet of car-share vehicles. In addition to the Mobility Hub, the proposed pedestrian network would be designed to align with existing pedestrian routes and crosswalks. Similarly, the proposed bicycle circulation would also be designed to align with existing bicycle infrastructure and would build upon the existing bikeway along Mission Road that connects into networks along the Los Angeles River and towards Downtown. Furthermore, vehicle circulation would be limited within the main campus and would be directed to designated drop-off areas and parking garages. Overall, the Proposed Project would develop an integrated multimodal transportation network within the Project Site and that connects to and serves the larger region.
Communities: Develop, connect, and sustain livable and thriving communities.	▪ Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. ▪ Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Consistent.** The Proposed Project would result in infill mixed-use land uses, which include a variety of land use types such as residential (at least 25 percent designated affordable), office, commercial, educational, and retail. The proposed land uses would be complemented by community and public spaces accommodated under the Proposed Project that would serve the larger community. The

Table 3.7-8 Consistency with Applicable SCAG 2024-2050 RTP/SCS Goals

2024-2050 RTP/SCS Goals	2024-2050 RTP/SCS Subgoals	Consistency
		Proposed Project would result in a connected and sustainable development within an underutilized and highly centralized Project Site that is proximate to jobs, housing, and transit.
Environment: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	▪ Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. ▪ Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water. ▪ Conserve the region's resources.	**Consistent.** As discussed above, the Proposed Project would accommodate infill mixed-use development. The accommodated land uses would consist of a variety of land use types such as residential, educational, retail, office, and commercial. Additionally, the Proposed Project would include community and public space to serve the proposed land uses. Furthermore, the Proposed Project circulation plan would include improvements to support active and public transit use. The Project Objectives, detailed in Section 2.3.2 in Chapter 2, *Project Description*, indicate the Proposed Project is aligned with the goal of the 2024-2050 RTP/SCS. The land use development activities accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include electric-ready requirement for mix-fueled single-family homes. Additionally, it also includes prescriptive PV system and battery requirements for multifamily buildings of more than three stories and noncommercial buildings such

Table 3.7-8 Consistency with Applicable SCAG 2024-2050 RTP/SCS Goals

2024-2050 RTP/SCS Goals	2024-2050 RTP/SCS Subgoals	Consistency
		as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	▪ Improve access to jobs and educational resources. ▪ Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent.** One of the objectives of the Proposed Project is to promote economic and workforce development that benefits the surrounding community. As stated, implementation of the Proposed Project would result in infill mixed-use residential and non-residential land uses. The proposed non-residential land uses, which include office, retail, commercial, and education uses would create an estimated7,482 jobs for the region. Any proposed future educational uses that may be developed through implementation of the Proposed Project would also provide additional educational resources, which would provide a local benefit to the future residents within the Community Plan area and the existing surrounding offsite residential communities. While the Proposed Project would accommodate some warehousing uses, its primary focus would be the development of residential and other types of non-warehousing land uses such as retail, office, hospitality, hospital, and educational uses and would not have a focus on goods movement systems.

Source: SCAG 2024.

County of Los Angeles 2045 CAP

The 2045 CAP is a comprehensive and actionable plan for implementing the GHG emissions reduction policies of the Air Quality Element and for reducing GHG emissions in the unincorporated areas of the County. It identifies detailed programs, actions, and performance goals that provide a road map to achieving the County's 2030, 2035, and 2045 reduction targets and its 2045 aspirational goal of achieving carbon neutrality. The 2045 CAP includes 10 strategies, 25 measures, and 94 actions across all GHG emissions-producing sectors (County of Los Angeles 2025). Table 3.7-9, *Consistency with the County of Los Angeles 2045 CAP*, evaluates consistency of the Proposed Project to the 2045 CAP strategies and measures to determine the overall consistency of the Proposed Project to the 2045 CAP. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as the 2045 CAP, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As shown in Table 3.7-9, the Proposed Project would not conflict with the 2045 CAP.

Table 3.7-9 Consistency with the County of Los Angeles 2045 CAP

Strategy	Measures	Consistency
Strategy 1: Decarbonize the Energy Supply	▪ Measure ES1: Develop a Sunset Strategy for All Oil and Gas Operations ▪ Measure ES2: Procure Zero-Carbon Electricity ▪ Measure ES3: Increase Renewable Energy Production ▪ Measure ES4: Increase Energy Resilience ▪ Measure ES5: Establish GHG Requirements for New Development	**Consistent.** The land use development activities accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include prescriptive PV system and battery requirements for multifamily buildings of more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Compliance with these requirements is compatible with the County's goal of decarbonizing the energy supply.
Strategy 2: Increase Densities and Diversity of Land Uses Near Transit	▪ Measure T1: Increase Density Near High-Quality Transit Areas ▪ Measure T2: Development Land Use Plans Addressing Jobs/Housing Balance and Increase Mixed Use	**Consistent.** Zonal Avenue, Marengo Street, and Mission Road are designated high quality transit corridors. The Proposed Project would introduce residential, retail, commercial, office, warehousing, hospital, and educational uses to the Project Site area. The Proposed Project would accommodate a variety of residential types and up to 3,200 dwelling units. Overall, implementation of the Proposed Project would accommodate approximately 8,000 residents and

Table 3.7-9 Consistency with the County of Los Angeles 2045 CAP

Strategy	Measures	Consistency
		create approximately 7,482 jobs. This increased density is in proximity to transit within a HQTA and is consistent with the County's goal.
Strategy 3: Reduce Single-Occupancy Vehicle Trips	▪ Measure T3: Expand Bicycle and Pedestrian Network to Serve Residential, Employment, and Recreational Trips ▪ Measure T4: Broaden Options for Transit, Active Transportation, and Alternative Modes of Transportation ▪ Measure T5: Limit and Remove Parking Minimums	**Consistent.** The Proposed Project would contribute to a reduction in single-occupancy trips through its location in proximity to high quality transit and inclusion of a Mobility Hub that would broaden options for alternative transit. The internal pedestrian network would connect to the surrounding community and expand bicycle accommodations.
Strategy 4: Institutionalize Low-Carbon Transportation	▪ Measure T6: Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales ▪ Measure T7: Electrify County Fleet Vehicles ▪ Measure T8: Accelerate Freight Decarbonization ▪ Measure T9: Expand Use of Zero-Emission Technologies for Off-Road Vehicles and Equipment	**Consistent.** As stated, the proposed Mobility Hub would include bus charging infrastructure. Furthermore, future development accommodated by the Proposed Project would be required to comply with the County of Los Angeles Code of Ordinances and CALGreen requirements regarding the number of electric vehicle parking spaces to support ZEVs and PHEVs.
Strategy 5: Decarbonize Buildings	▪ Measure E1: Decarbonize Existing Buildings ▪ Measure E2: Decarbonize New Development ▪ Measure E3: Other Decarbonization Actions	**Consistent.** The future land use development projects accommodated under the Proposed Project would be required to comply with the Building Energy Efficiency Standards and CALGreen. Through adaptive reuse of the existing General Hospital Building, which contains highly outdated and inefficient energy infrastructure, the Proposed Project would be in alignment with this strategy.
Strategy 6: Improve Efficiency of Existing	▪ Measure E4: Improve Energy Efficiency of Existing Buildings	**Consistent:** Through adaptive reuse of the existing General Hospital Building, which contains highly outdated and inefficient energy infrastructure, the Proposed Project would

Table 3.7-9 Consistency with the County of Los Angeles 2045 CAP

Strategy	Measures	Consistency
Building Energy Use		include new energy efficiency features and standards that would be in alignment with this strategy.
Strategy 7: Conserve Water	▪ Measure E5: Increase Use of Recycled Water and Graywater Systems ▪ Measure E6: Reduce Indoor and Outdoor Water Consumption	**Consistent:** The Proposed Project would be required to comply with the County of Los Angeles Code of Ordinances and CALGreen requirements regarding water efficiency measures.
Strategy 8: Minimize Water and Recover Energy and Materials from the Waste Stream	▪ Measure W1: Institutionalize Sustainable Waste Systems and Practices ▪ Measure W2: Increase Organic Waste Diversion	**Consistent:** The Proposed Project would comply with the waste diversion requirements under Division 4.4 of CALGreen, the recycling mandates for commercial and multifamily residential uses under AB 341, the organic waste recycling mandates under AB 1826, and the diversion requirements under the County of Los Angeles Code of Ordinances Chapter 20.87. In addition, the Proposed Project would divert demolition debris that would enter landfills through reprocessing and retaining within the Project Site.
Strategy 9: Conserve and Connect Wildlands and Working Lands	▪ Measure A1: Conserve Forests, Woodlands, Shrublands, Grasslands, Desert, and other Carbon-Sequestering Wildlands and Working Lands	**No Conflict:** The Project Site is built out and there are no wildlands or working lands within its boundaries. However, shade trees would be included as part of the proposed pedestrian circulation improvements under the Proposed Project.
Strategy 10: Sequester Carbon and Implement Sustainable Agriculture	▪ Measure A2: Support Regenerative Agriculture ▪ Measure A3: Expand Unincorporated Los Angeles County's Tree Canopy and Green Spaces	**No Conflict:** As stated above, shade trees would be included as part of the proposed pedestrian circulation improvements under the Proposed Project. Additionally, the Proposed Project would accommodate a community food garden.

Source: County of Los Angeles 2024.

In summary, the Proposed Project would accommodate infill mixed-use development to include residential, educational, retail, office, hospitality, hospital, warehousing, and commercial uses on an underutilized Project Site that is strategically positioned in an HQTA. The Proposed Project includes community and public space to serve the proposed land uses and circulation improvements that support active and public transit use. The land use development activities accommodated under the Proposed Project would, at minimum, be required to comply with the Building Energy Efficiency Standards. The current 2025 Building Energy Efficiency Standards include electric-ready requirement for mix-fueled single-family homes. Additionally, it also includes prescriptive PV system and battery storage requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. Therefore, as demonstrated, the Proposed Project does not conflict with applicable plans that have been adopted to reduce GHG emissions, including the 2022 Scoping Plan, County of Los Angeles 2045 CAP, and 2024-2050 RTP/SCS, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.7.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative greenhouse gas emission impacts consists of is not confined to a particular air basin, but worldwide. Therefore, impacts under Greenhouse Gas Emissions impact discussions (a) and (b) are not project-specific impacts to global warming, but are the Proposed Project's contribution to this cumulative impact. This cumulative study area is the same study area identified in the 2014 Master Plan EIR.

Would the project have a cumulative effect related to greenhouse gas emissions?

Greenhouse Gas Emissions

Construction and Operation

Climate change is a global phenomenon resulting from the accumulation of GHGs in the atmosphere over time. Accordingly, GHG emissions from past, present, and reasonably foreseeable future projects collectively contribute to cumulative impacts related to climate change. Unlike other resource areas where cumulative impacts may be localized, GHG emission combine in the global atmosphere and contribute to climate change regardless of their geographic origin. Therefore, the Proposed Project's contribution to cumulative GHG impacts is evaluated based on whether the Proposed Project would result in a net increase in GHG

emissions and whether those emissions would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

As stated, Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impact discussion (a) is not a project-specific impact, but the Proposed Project's contribution to a cumulative impact. Implementation of the Proposed Project would result in annual emissions that would exceed South Coast AQMD's bright-line threshold. Therefore, Project-related GHG emissions and their contribution to global climate change would be cumulatively considerable, and GHG emissions impacts would be potentially **significant**.

Impact GHG-2: The Proposed Project, together with cumulative projects, would substantially impact greenhouse gases.

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

Significance with Mitigation: Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d would contribute to minimizing Project-related GHG emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term GHG emissions generated from the Proposed Project could still exceed the South Coast AQMD bright-line threshold of 3,000 $MTCO_2e$/yr Therefore, Impact GHG-2 would remain **significant and unavoidable**.

Conflicts with Applicable Plans, Policies, and Regulations

Construction and Operation

Climate change is a global phenomenon resulting from the accumulation of GHGs in the atmosphere over time. As such, GHG emissions from past, present, and reasonably foreseeable future projects collectively contribute to cumulative climate change impacts. Unlike other environmental issue areas where cumulative impacts may be localized, GHG emissions combine in the global atmosphere regardless of their geographic origin.

Applicable State and regional plans, policies, and regulations, such as those adopted by the State of California to achieve the greenhouse gas reduction targets established in Assembly Bill 32 and Senate Bill 32, are intended to reduce statewide GHG emissions and address the cumulative impacts of climate change. Projects that are consistent with these regulatory frameworks and applicable local climate action policies would not conflict with the State's strategy for reducing GHG emissions.

As discussed above, the Proposed Project would be consistent with applicable state and local plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Therefore,

the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions and would not make a cumulatively considerable contribution to climate change impacts. Impacts would be **less than significant**.

Significance without Mitigation: Less than Significant. No mitigation is necessary.

3.7.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.7.4, *Project Impact Analysis*, and 3.7.5, *Cumulative Impact Analysis*, the Proposed Project would not conflict with applicable state, regional, and local plans related to GHG emissions reductions and impacts would be less than significant. However, the Proposed Project would result in significant and unavoidable GHG emissions impacts (construction and operation) even with implementation of Mitigation Measures GHG-1a through GHG-1d

The 2014 Master Plan EIR identified similar impact determinations for the 2014 Master Plan. Similar to the Proposed Project, the 2014 Master Plan was determined to also not conflict with applicable plans related to achieving GHG emissions reductions and impacts were determined to be less than significant. Although the consistency analysis for the Proposed Project included analyses of additional plans not considered in the 2014 Master Plan EIR (i.e., 2045 CAP and the 2024-2050 RTP/SCS), the Proposed Project would not conflict with these plans. The 2014 Master Plan EIR calculated total annual GHG emissions of 66,554 $MTCO_2e$/yr and an overall net increase over existing conditions of 37,281 $MTCO_2e$/yr for the 2014 Master Plan Project, which also resulted significant and unavoidable GHG emissions impacts (construction and operation) even with implementation of mitigation for the 2014 Master Plan. Table 3.7-10, *Annual GHG Emissions Comparison*, compares annual GHG emissions for the 2014 Master Plan as quantified in the 2014 Master Plan EIR to the emissions estimated for the Proposed Project. As shown in the project, the Proposed Project would result in overall greater emissions of 61 percent compared to the 2014 Master Plan.

Table 3.7-10 Annual GHG Emissions Comparison

Scenario	Annual Emissions ($MTCO_2e$/yr)
2014 Master Plan EIR Project Net Emissions[1]	37,281
Proposed Project Net Emissions	60,265
Net Difference	**18,148**
Net Difference (%)	61%

Notes: () = negative value. Manual summation of the shown values may not equal to the shown Total values due to rounding.

1. The emissions shown represent the net increase in emissions associated with implementation of the 2014 Master Plan as disclosed in the 2014 Master Plan EIR.

To address GHG emissions impacts identified for the Proposed Project, this Draft SEIR prescribes additional mitigation measures beyond those identified in the 2014 Master Plan EIR. For example, Mitigation Measure GHG-1b prescribes a specific energy consumption reduction target for the Proposed Project while Mitigation Measure GHG-1c requires the property owner to enroll in an available carbon-free electricity plan from LADWP. In addition, this Draft SEIR also includes still applicable mitigation measures identified in the 2014 Master Plan EIR. Inclusion of new mitigation and the revisions to the 2014 Master Plan EIR mitigation measures reflect regulatory changes since the 2014 Master Plan EIR, and the specific improvements proposed under the Proposed Project. Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.8 HAZARDS AND HAZARDOUS MATERIALS

This chapter of the Draft SEIR discusses potential impacts related to hazards and hazardous materials from development and implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. This chapter addresses also addresses potential impacts associated with wildland fire hazards. See Chapter 3.18, *Wildfire*, for the regulatory framework and existing conditions information pertaining to wildfire.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, comments were received regarding hazards and hazardous materials impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document. Comments related to hazards and hazardous materials were considered in the preparation of this analysis.

This analysis was informed by multiple reports and studies prepared for the areas within the Project Site. These reports, completed from 2018 through 2025, inform baseline environmental conditions and identify localized hazardous materials and subsurface concerns across different areas of the Project Site. Together, they establish the technical foundation for the evaluation of hazards and hazardous materials presented in this chapter.

- *Phase I Environmental Site Assessment, General Hospital Development Project, 1200 North State Street, Los Angeles, California*, AECOM, November 30, 2023. (Appendix G.1 of this Draft SEIR)
- *Phase II Subsurface Investigation and Methane Survey Report, Los Angeles County General Hospital Redevelopment, 1200 North State Street, Los Angeles, California*, Citadel EHS, August 5, 2025. (Appendix G.2 of this Draft SEIR)
- *LAC+USC Tunnel Structural and Mechanical Assessment and Asbestos Survey, 1200 North State Street, Los Angeles, California*, Vanir Construction Management, JCE Structural Engineering Group, M-E Engineers, and Focus Environmental Consultants, January 30, 2013. (Appendix G.3 of this Draft SEIR)
- Environmentally Regulated Materials (ERMs) Survey Report: Limited Pre-demolition Level ERM Survey, Los Angeles County General Hospital Redevelopment Outbuildings, 1200 N. State Street, Los Angeles, California, Citadel EHS, September 19, 2025. (Appendix G.4 of this Draft SEIR)
- *Soil Management Plan (SMP), 1200 North State Street, Los Angeles, California 90033*, prepared by Citadel EHS, January 2026. (Appendix G.5 of this Draft SEIR).
- *Report of Geotechnical Investigation for Structural Condition Assessment and Seismic Evaluation, LAC+USC Medical Center: Old Pharmacy Warehouse Project, 1100 N. Mission*

Road, Los Angeles, California, Geotechnical Professionals, November 7, 2022. (Appendix F.5 of this Draft SEIR)

- *Geotechnical Engineering Assessment, Los Angeles County General Hospital Redevelopment: Proposed Stabilization Project, 1200 North State Street, Los Angeles, California*, Geotechnologies, August 29, 2025. (Appendix F.6 of this Draft SEIR)

3.8.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Federal Toxic Substances Control Act (1976) and Resource Conservation and Recovery Act of 1976

The Federal Toxic Substances Control Act (1976) (15 U.S. Code (USC) secs. 2601–2697) and the Resource Conservation and Recovery Act of 1976 (RCRA) (42 USC sec. 6901 et seq.) established a program, administered by the U.S. Environmental Protection Agency (EPA), for regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. Hazardous waste in California is regulated primarily under the authority of the RCRA. The RCRA was established in 1976 to protect human health and the environment, reduce waste, conserve energy and natural resources, and eliminate the generation of hazardous waste. Under the authority of the RCRA, the regulatory framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, or dispose of hazardous waste, is found in the Code of Federal Regulations (CFR).

- **49 CFR Sections 172 and 173.** These regulations establish standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes as well as training requirements for personnel who complete shipping papers and manifests.
- **40 CFR Subchapter I: Solid Wastes.** These regulations implement the provisions of the Solid Waste Act and the RCRA. They also establish criteria for the classification of solid waste disposal facilities (landfills), hazardous waste characteristic criteria, regulatory thresholds, hazardous waste generator requirements, and requirements for the management of used oil and universal wastes.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (42 USC sec. 11001 et seq.) to inform communities and citizens of chemical hazards in their areas. It requires businesses to report the locations and quantities of chemicals stored on-site to State and local agencies, releases to the environment of more than 600 designated toxic chemicals; off-site transfers of waste, and pollution prevention measures and activities. It also requires businesses to participate in chemical recycling. The EPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by specific industry groups and federal facilities—the Toxics Release Inventory.

To implement EPCRA, each state appoints a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divide their states into emergency planning districts and name each district's local emergency planning committee. The federal EPCRA program is implemented and administered in California by the Governor's Office of Emergency Services, a state commission, 6 district committees, and 81 Certified Unified Program agencies (CUPA). The Office of Emergency Services coordinates and provides staff support for the commission and district committees.

National Emission Standards for Hazardous Air Pollutants

EPA established the National Emissions Standards for Hazardous Air Pollutants to govern the use, removal, and disposal of asbestos-containing materials (42 USC sec. 7412; 40 CFR Part 61, Subpart M). Responsibility for implementing these requirements has been delegated to the states. California has delegated the responsibility to the South Coast Air Quality Management District (AQMD), which implements the National Emissions Standards for Hazardous Air Pollutants through Rule 1403 (see Section 3.4.1.3 of the Draft SEIR, *Regional and Local*).

Occupational Safety and Health Administration Standards

The Occupational Safety and Health Administration's (OSHA) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA's staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR Part 1910.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) (USC sec. 2601–2697, Title 15, Chapter 53) of 1976 gives the EPA the authority to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. The TSCA addresses the

production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs the EPA to regulate lead-based paint hazards.

TSCA Sections 402 and 404 require those engaged in lead abatements, risk assessments, and inspections in homes or child-occupied facilities built before 1978 (such as in daycare centers and kindergartens) to be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, Residential Hazard Standards for Lead in Paint, Dust, and Soil, sets standards for dangerous lead levels in paint, household dust, and residential soil.

Hazardous Materials Transportation Act

The United States Department of Transportation regulates hazardous materials transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials under Title 49 of the CFR, which reflects laws passed by Congress as of January 2, 2006, last amended April 15, 2022. State agencies responsible for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. These agencies also govern permitting for hazardous materials transportation.

Resource Conservation and Recovery Act (RCRA) (1976)

The Resource Conservation and Recovery Act (RCRA) (42 United States Code [U.S.C.] Section 6901 et seq.) established a comprehensive framework for the management of solid and hazardous waste, including medical and infectious wastes that exhibit hazardous characteristics. Under RCRA, the U.S. EPA regulates generators, transporters, and treatment, storage, and disposal facilities to ensure proper waste handling and to protect public health and the environment (EPA 2025). Medical waste that contains hazardous chemical constituents (e.g., solvents, formaldehyde, mercury, pharmaceuticals, or radiological materials) is regulated as a hazardous waste under RCRA and must comply with labeling, storage, and manifesting requirements for hazardous waste management (EPA 2025).

Federal Aviation Administration (FAA) Regulations – Helipads

The Federal Aviation Administration (FAA) regulates the design, construction, and operation of heliports and helipads under Advisory Circular (AC) 150/5390-2C, Heliport Design (FAA 2023). These standards establish minimum safety and design criteria for touchdown and liftoff areas (TLOF), approach and departure surfaces, load-bearing capacities, lighting, markings, and airspace protection to ensure safe helicopter operations in proximity to people and structures. Under 14 CFR Part 77 (Safe, Efficient Use, and Preservation of the Navigable Airspace), the FAA requires obstruction evaluation and airspace review for proposed helipads or modifications that could affect navigable airspace. Developers must file a Notice of Proposed Construction or Alteration (FAA Form 7460-1) for review and determination of potential airspace hazards prior

to construction. Compliance with FAA heliport design and airspace protection standards ensures safe siting and operation of helipads and avoids conflicts with existing flight paths and air traffic control procedures.

Radioactive Materials Regulations

The use, storage, and disposal of radioactive materials are regulated at the federal level by the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR Parts 19–20 and 30–35, which establish standards for protection against radiation, occupational exposure limits, and licensing requirements for byproduct materials. In California, regulatory authority for radioactive materials is delegated to the California Department of Public Health (CDPH), Radiologic Health Branch (RHB) under Title 17 California Code of Regulations [CCR] Sections 30100–30295, and locally administered by the Los Angeles County Department of Public Health Radiation Management Unit. These agencies oversee registration, inspection, and disposal of radioactive materials and ensure that demolition and redevelopment activities involving such materials comply with health and safety standards (CDPH 2025a).

STATE

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board (CARB), State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB), CalRecycle, Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment (OEHHA), and Department of Pesticide Regulation (DPR) under one agency. These agencies were placed under the CalEPA "umbrella" to protect human health and the environment and ensure the coordinated deployment of State resources. The mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (HWCL) (California Health and Safety Code [HSC] sec. 25100–25259, Division 20, Chapter 6.5) is administered by CalEPA to regulate hazardous wastes. Although the HWCL is generally more stringent than the RCRA, until the EPA approves the California program, both the State and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous. The HWCL also:

- Establishes criteria for identifying, packaging, and labeling hazardous wastes.
- Prescribes management controls.
- Establishes permit requirements for treatment, storage, disposal, and transportation.

- Identifies some wastes that cannot be disposed of in landfills.

Under the HWCL "hazardous waste" is defined in the California Health and Safety Code (HSC) sec. 25117 and further characterized in CCR Title 22, Division 4.5, Chapter 11, Article 3 (Identification and Listing of Hazardous Waste). Article 3 establishes the criteria for determining whether hazardous wastes exhibit the characteristics of toxicity, ignitability, corrosivity, or reactivity. These regulatory provisions provide the operative definitions for hazardous waste under the HWCL.

The characteristic definitions of toxicity, ignitability, corrosivity, and reactivity are specifically set forth in CCR Title 22, Division 4.5, Chapter 11, Articles 3 and 4. These provisions establish regulatory thresholds and criteria rather than descriptive health-effect discussions.

Radiation Control Law

Radioactive materials are under the Radiation Control Law (HSC sec. 114960 et seq.). The Radiation Control Law establishes a comprehensive program for the registration, licensing, use, transportation, storage, and disposal of radioactive materials in California. The law is administered by the California Department of Public Health, Radiologic Health Branch, and is intended to protect public health and safety by regulating sources of ionizing radiation, including medical and industrial radioactive materials and radiation-producing equipment. Facilities that possess or use radioactive materials must obtain appropriate permits or licenses, comply with radiation safety standards, maintain required monitoring and reporting programs, and implement decontamination and disposal procedures in accordance with State and federal requirements.

California Medical Waste Management Act

Biohazardous waste is regulated under the California Medical Waste Management Act (HSC sec. 117600–118360). The California Medical Waste Management Act establishes requirements for the handling, storage, treatment, transportation, and disposal of medical waste generated by healthcare facilities and related operations. The Act applies to regulated medical waste, including biohazardous waste, sharps waste, pharmaceutical waste, and trace chemotherapy waste, and is administered and enforced at the local level, typically by county health departments, under the oversight of the California Department of Public Health. Generators of medical waste are required to properly segregate, label, containerize, store, and treat medical waste prior to disposal, and to use registered medical waste haulers for off-site transport. These requirements are intended to prevent exposure to infectious agents and protect public health and the environment.

Hazardous Waste Control Act

DTSC is responsible for enforcement of the Hazardous Waste Control Act (California HSC sec. 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and the development of standards that are equal to or, in some cases, more stringent than federal requirements.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include workplace regulations to ensure appropriate training regarding the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who handle hazardous materials are appropriately trained and informed about the materials. Division 5, Part 6 governs operation and care of hazardous material storage tanks and boilers. Division 5, Part 7 ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing. Division 5, Part 7.5 otherwise referred to as the California Refinery and Chemical Plant Worker Safety Act of 1990, was enacted to prevent or minimize the consequences of catastrophic releases of toxic, flammable, or explosive chemicals. The establishment of process safety management standards is intended to eliminate, to a substantial degree, the risks to which workers are exposed in petroleum refineries, chemical plants, and other related manufacturing facilities.

California Health and Safety Code and Code of Regulations

California HSC Chapter 6.95 and CCR, Title 19, Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.

CCR Title 22, Division 4.5 sets the requirements for hazardous waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting loads of hazardous waste, including manifesting, vehicle registration, and accidental emergency discharges during transportation.

Asbestos-Containing Materials Regulations

In conjunction with the EPA and California Occupational Safety and Health Administration (Cal/OSHA), State-level agencies regulate removal, abatement, and transport procedures for asbestos-containing materials. These regulations prohibit asbestos releases from industrial, demolition or construction activities, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. The regulations include warnings and practices needed to reduce the risk of asbestos emissions and exposure. For example, 8 CCR Section 1529 provides for exposure limits, exposure monitoring, respiratory protection, and good working practices for workers exposed to asbestos. Finally, federal, State, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls Regulations

PCBs are regulated under 40 CFR Part 761 as part of the TSCA. The PCB regulations and requirements apply to both PCB waste materials and PCBs still in use. States and the Federal Government regulate the use, storage, and disposal of equipment containing PCBs, depending upon the concentrations of PCBs present. DTSC enforces Title 22 of the California Code of Regulation, Chapter 11, Article 3, which established threshold limits for PCBs in solid waste material.

The EPA prohibited the use of PCBs in most of the new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The provisions of the TSCA regulate the inclusion of PCBs in electrical equipment and the handling of PCBs. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline safety procedures for their disposal. The State likewise considers PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste and regulates them; accordingly, these regulations require that such materials be treated, transported, and disposed of as hazardous waste. At lower concentrations for nonliquids, regional water quality control boards may exercise discretion over classifying such wastes.

Lead Regulations

Cal/OSHA's "Lead in Construction Standard" is in 8 CCR Section 1532.1. This section applies to all construction work where an employee may be exposed to lead. The regulations address permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Hazardous Materials Disclosure Programs

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by CUPAs. The Los Angeles County Fire Department (LACFD) is the designated CUPA for hazardous materials in Los Angeles County. Under the Unified Program, the LACFD's Health Hazardous Materials Division consolidates, coordinates, and makes consistent the administrative requirements, permits, inspection, and enforcement activities associated with several regulatory programs.

Underground Storage Tank Program

The purpose of the UST Program is to protect people and the environment from releases of petroleum and other hazardous substances from tanks. The statutes govern the UST Program in the Solid Waste Disposal Act (1965). Because of the localized nature of USTs, the EPA shifts enforcement and oversight authority to local governments. California laws and regulations authorize the State Water Resources Control Board to implement the UST program. The State Water Resources Control Board then delegates the field implementation to CUPAs.

There are four program elements related to USTs:

1. Leak Prevention includes requirements for tank installation, construction, testing, leak detection, spill containment, and overfill protection. The State issues CUPAs as the overseer for the Leak Prevention Program. The CUPA responsible for implementing this program element is the County of Los Angeles CUPA (LA County CUPA).
2. Cleanup of leaking tanks includes groundwater and soil testing followed by remediation. The LA County CUPA oversees the cleanup of "soils-only" contamination cases. The local CUPA refers sites with groundwater contamination to the Los Angeles Regional Water Quality Control District.
3. Enforcement of existing regulations is delegated by the State Water Resources Control Board to local agencies enforcing UST requirements (LA County CUPAs) for everything except cleanup of groundwater contamination.
4. Tank Tester Licensing tests the integrity of tanks and is required by law and administered by the Office of Tank Tester Licensing within the State Water Board.

California Fire Code

The California Fire Code is in 24 CCR Part 9. The Code is updated every three years and includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, fire hydrant locations and distribution, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal supports CAL FIRE's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education. The State Fire Marshal provides for fire prevention by enforcing fire-related laws in State-owned or -operated buildings; investigating arson fires in California; licensing those who inspect and service fire protection systems; approving fireworks for use in California; regulating the use of chemical flame retardants; evaluating building materials against fire safety standards; regulating hazardous liquid pipelines, and tracking incident statistics for local and State government emergency response agencies. The California Fire Plan is the State's road map for reducing wildfire risk through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The California Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE.

California Medical Waste Management Act (MWMA)

The California Medical Waste Management Act (MWMA) (California HSC Sections 117600–118360) governs the generation, handling, storage, treatment, and disposal of medical waste within the State. The law defines medical waste as waste generated in the diagnosis, treatment, or immunization of humans or animals, including biohazardous waste, sharps, pathological waste, pharmaceutical waste, and trace chemotherapy waste (CDPH 2017). The MWMA requires medical waste generators to register with the enforcement agency, segregate medical waste from other waste streams, and ensure proper containment in leak-resistant, rigid, and labeled containers bearing the universal biohazard symbol (HSC Section 118280; CDPH 2017).

The MWMA also establishes storage time limits and temperature controls for medical waste (up to 7 days at room temperature or 90 days if refrigerated) and mandates treatment at permitted facilities through approved methods such as autoclaving, incineration, or alternative technologies (HSC Sections 118310, 118215; CDPH 2017). Transport of medical waste off-site must comply with HSC Section 118040, which requires the use of registered haulers and tracking documents ("manifests") from the point of generation to the treatment or disposal facility (FindLaw 2023).

Medical waste that exhibits hazardous or radioactive characteristics is classified as a "mixed waste" and is jointly regulated under the MWMA and the RCRA for hazardous components or

by the U.S. Nuclear Regulatory Commission for radioactive components (EPA 2025). Decontamination and disposal of reusable medical and laboratory equipment must comply with infection control and worker safety standards established under Cal/OSHA Title 8, California CCR Section 5193 (Bloodborne Pathogens Standard) (Cal/OSHA 2025).

Heliport and Helipad Regulations At the State level, the California Department of Transportation (Caltrans) Division of Aeronautics implements and enforces heliport and helipad regulations under the State Aeronautics Act (Public Utilities Code Sections 21001–21686) and CCR Title 21, Subchapter 6, Articles 2–7 (Airport and Heliport Site Approval Regulations). Caltrans reviews proposed heliport and helipad projects for consistency with FAA safety standards, land use compatibility, and environmental considerations, and issues site approval permits for public-use and hospital heliports. Site approval requires compliance with Caltrans Heliport Permit Policy and Procedures (Order No. DAP-2) and evaluation of approach/departure clear zones, obstacle limitation surfaces, emergency access, and noise exposure to surrounding communities. Hospital heliports are also subject to CCR Title 21, Section 3554, which sets additional standards for patient transport safety and emergency access. Caltrans approval is required prior to construction or modification of any heliport or helipad to ensure statewide consistency with aviation safety and community protection standards (Caltrans 2025).

Radioactive Materials Regulations

The use, storage, and disposal of radioactive materials are regulated at the federal level by the U.S. Nuclear Regulatory Commission (NRC) under 10 CFR Parts 19–20 and 30–35, which establish standards for protection against radiation, occupational exposure limits, and licensing requirements for byproduct materials. In California, regulatory authority for radioactive materials is delegated to the California Department of Public Health (CDPH), Radiologic Health Branch (RHB) under Title 17 CCR Section 30100–30295, and locally administered by the Los Angeles County Department of Public Health Radiation Management Unit. These agencies oversee registration, inspection, and disposal of radioactive materials and ensure that demolition and redevelopment activities involving such materials comply with health and safety standards (USNRC 2025).

Universal Waste Rule

The California CTSC implements the Universal Waste Rule (22 CCR Division 4.5, Chapter 23), which establishes streamlined collection and management standards for widely generated hazardous wastes such as batteries, fluorescent lamps, cathode ray tubes, electronic devices, and mercury-containing equipment. The rule is intended to promote recycling, reduce improper disposal, and simplify regulatory compliance for generators handling relatively low-risk hazardous wastes. Universal wastes must be properly labeled, stored in closed containers, and sent to authorized recycling or disposal facilities. These requirements apply to generators, transporters, and facilities that manage universal waste streams during demolition, renovation, and redevelopment activities (TRW 2025).

REGIONAL

South Coast Air Quality Management District Rule 1403

Rule 1403, as amended, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and use appropriate warning labels, signs, and markings.

State Aeronautics Act

Airport authorities and other agencies regulate aircraft activity. The State Aeronautics Act of the California Public Utilities Code establishes statewide requirements for airport land use compatibility planning. It requires nearly every county to create an Airport Land Use Commission (ALUC) or an alternative. There are 15 airports under LA County ALUC's jurisdiction. Five are county owned, other public entities own nine, and one is privately owned. The airport land use compatibility plan in the County is primarily concerned with land uses near Los Angeles International Airport, Long Beach Municipal Airport, Bob Hope Airport, and Torrance Airport. The project site is not located within an airport influence area or protection zone (County of Los Angeles 2024).

Oil and Gas Well Abandonment Regulations

The California Geologic Energy Management Division (CalGEM, formerly the Division of Oil, Gas, and Geothermal Resources) regulates the drilling, operation, maintenance, and abandonment of oil and gas wells pursuant to Division 3 of the Public Resources Code and Title 14 of the California Code of Regulations. CalGEM requires that idle and abandoned wells be properly abandoned to prevent subsurface leaks and uncontrolled releases of oil, gas, or methane. Requirements include cement plugging, venting safeguards, and oversight by CalGEM inspectors.

County of Los Angeles implements these requirements through its building and grading permit processes, which require disclosure of well locations on development sites and verification of CalGEM-approved abandonment before construction proceeds.

LOCAL

As the County of Los Angeles is the owner of the Project Site, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The Proposed Project remains subject to applicable federal and State laws, regulations, and policies. For coordination

purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for information purposes only.

County of Los Angeles

Los Angeles County Department of Public Works

At the local level, hazardous materials and hazardous waste management within Los Angeles County are primarily regulated and administered by the Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division (EPD), which serves as the CUPA for the County's unincorporated areas and participating cities. The EPD implements and enforces State-mandated hazardous materials programs, including the UST Program, Hazardous Materials Business Plan (HMBP) Program, and related hazardous waste generator requirements.

County of Los Angeles Environmental Programs Division

LACDPWEPD prepares and administers the County of Los Angeles Integrated Waste Management Plan and Hazardous Waste Management Plan, which provide direction for proper management of all waste generated within the County. EPD advises the Los Angeles County Board of Supervisors on all waste management issues. EPD also implements numerous programs, including recycling, composting, source reduction, household hazardous waste management, and public education programs, to meet State-mandated solid waste reduction goals. These programs regulate USTs in the County's unincorporated areas and more than 76 cities to protect groundwater resources. The programs are the largest in the State, encompassing some 10,000 USTs at more than 2,500 sites. EPD reviews and approves site remediation plans for the cleanup of contamination caused by leaking USTs. It also regulates industrial waste management systems at 5,000 generator sites as well as permit and inspect industrial waste discharges along more than 3,000 miles of local sewers within the County's unincorporated areas and 38 contract cities. EPD responds as a support unit to reported incidents involving existing and/or potential discharges of contaminants or toxic materials/waste into DPW drainage facilities.

County of Los Angeles Department of Public Health – Medical Waste Management Program

The Los Angeles CDPH, Environmental Health Division, serves as the local enforcement agency for the MWMA within Los Angeles County (CDPH 2025b). CDPH implements registration, inspection, and compliance monitoring for medical waste generators, including hospitals, laboratories, and other healthcare facilities. CDPH enforces requirements related to on-site segregation, storage, labeling, transportation, and treatment of medical waste and oversees

disposal at permitted medical waste treatment facilities (CDPH 2017).County of Los Angeles All-Hazards Mitigation Plan

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The County of Los Angeles All-Hazards Mitigation Plan (HMP) was prepared and adopted in May 2020 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The HMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the County. In the context of an HMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The HMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide (County of Los Angeles 2020).

County of Los Angeles Operational Area Emergency Response Plan

The County of Los Angeles Office of Emergency Management is responsible for coordinating agency response to disasters or other large-scale emergencies in the county. The County of Los Angeles Operational Area Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials (OEM 2023).

County of Los Angeles Code of Ordinances

The County of Los Angeles Code of Ordinances establishes regulations and standards to protect public health, safety, and the environment through the proper management of hazardous materials and hazardous waste. In particular, Title 12 (Environmental Protection) and Title 11 (Health and Safety) of the County Code adopt and supplement State and federal hazardous materials control laws to ensure safe handling, storage, transportation, and disposal of hazardous substances. These provisions are intended to prevent the release of hazardous materials during construction and operation, protect workers and the surrounding community from exposure, and ensure compliance with emergency response and reporting requirements. The County of Los Angeles Code of Ordinances sets forth the following specific regulations governing hazardous materials management and disclosure:

- **Title 12, Section 12.52.010 et seq. (Hazardous Waste Control).** Establishes requirements for the generation, storage, and disposal of hazardous waste in compliance with State and federal law.
- **Title 12, Section 12.64.010 et seq. (Hazardous Materials Disclosure and Risk Management).** Requires businesses handling hazardous materials to prepare and implement risk management and emergency response plans.
- **Title 11, Division 4 (Underground Storage of Hazardous Materials).** Regulates the permitting, construction, monitoring, and closure of USTs containing hazardous substances.

County of Los Angeles General Plan

The Los Angeles County General Plan 2035 (LA County General Plan 2035) includes goals and policies to ensure development is designed and operated in a manner that protects public health and safety with respect to hazardous materials management. Policies that are applicable to the Proposed Project are as follow (County of Los Angeles 2025):

- **Policy C/NR 15.2.** Require safe removal, handling, and disposal of hazardous materials encountered during grading, demolition, or redevelopment activities.
- **Policy S 3.1.** Require new development to comply with all applicable hazardous materials and hazardous waste regulations, including disclosure, permitting, and emergency response planning.
- **Policy S 3.2.** Reduce public exposure to hazardous materials by ensuring safe siting of facilities that use, store, or transport hazardous substances.
- **Policy S 3.4.** Support the remediation of contaminated sites and the safe management or closure of underground storage tanks and other legacy hazardous materials sources.

City of Los Angeles

Bureau of Sanitation Programs

Although hazardous material transportation and disposal are largely regulated through State and federal programs, the City of Los Angeles Bureau of Sanitation runs several programs related to the collection and disposal of hazardous waste generated by residential, commercial, and industrial users in the city and surrounding communities. These programs include household hazardous waste disposal events, permanent collection centers, and services for businesses generating small quantities of hazardous wastes.

City of Los Angeles Fire Department

Within the City of Los Angeles, hazardous materials programs are administered by the Los Angeles Fire Department (LAFD), which serves as the CUPA for the City. LAFD implements and

enforces State-mandated hazardous materials programs, including emergency planning and community right-to-know requirements, hazardous materials business plans, risk management plans, and UST oversight.

City of Los Angeles Fire Department's Hazardous Materials Section

LAFD's Hazardous Materials Section is the administrative agent for the California HSC, CCRs related to emergency planning and community right-to-know laws, and the federal SARA Title III. There are three units within this department that process information related to hazardous materials. The Disclosure Unit is responsible for enforcing the disclosure law, which requires all establishments that store, produce, or use hazardous substances to inventory the materials on-site; this law includes new and existing businesses. The Business Plan Unit ensures that businesses take the right measures to mitigate any dangers. The Risk Management and Prevention Program (RMPP) Unit is responsible for evaluating the RMPPs that businesses have to submit. An RMPP, which is intended to reduce risks associated with the handling of acutely hazardous materials, is required of businesses that handle 55 gallons, 500 pounds, or 200 cubic feet or more of such materials. Because the Project Site is a County-owned property, LAFD's authority is limited to fire protection services and coordination; however, LAFD remains the primary hazardous materials regulatory agency within the City's jurisdiction and is referenced for contextual purposes.

City of Los Angeles Fire Department's Bureau of Fire Prevention and Public Safety

LAFD's Bureau of Fire Prevention and Public Safety maintains an UST Unit, which implements and enforces the UST program. All USTs used for fuel, solvents, and other liquids must be monitored for leakage. The law requires UST installations, removals, or alterations to be regulated under permit from LAFD. All USTs installed after January 1, 1984, are required to have secondary containment in addition to a leak detection system. Those installed prior to January 1, 1984, are classified as existing tanks and are required to have a soil analysis report and a continuous monitoring device. Although the Proposed Project would be developed on a site owned and operated by the County, LAFD Bureau of Fire Prevention and Public Safety is relevant due to the proximity of properties under city jurisdiction.

Fire Code

The City of Los Angeles Fire Code (City of Los Angeles Municipal Code Chapter 5, Article 7) prescribes laws for hazardous material storage and handling, thereby safeguarding life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use of buildings, structures, or other premises). Because the Project Site is owned and operated by the County of Los Angeles, the City of Los Angeles Fire Code is not directly binding. However, the Project Site is located within the LAFD service area, and the County coordinates with LAFD

regarding fire protection services, emergency response, and hazardous materials oversight. Accordingly, the City Fire Code is referenced for contextual and coordination purposes.

City Building Code - Methane Seepage Regulations

Division 71 of the Los Angeles Building Code sets forth regulations for the control of methane intrusion emanating from geologic formations. The methane seepage regulations specify site testing requirements and methane mitigation standards for all new buildings and paved areas (i.e., 5,000 square feet of paved area within 15 feet of an exterior wall of a commercial, industrial, institutional, or residential building) within designated methane zones or within methane buffer zones. Because the Project Site is owned and operated by the County of Los Angeles, the City of Los Angeles Building Code is not directly binding on the County. However, the Project Site is located within a designated Methane Zone, and methane testing and mitigation measures consistent with Division 71 requirements have been incorporated into the Proposed Project (see Appendix G.1 and G.2). Accordingly, the City Building Code methane regulations are referenced for contextual and coordination purposes.

3.8.2 Existing Conditions

The Project Site has been occupied by hospital and medical facilities since the 1800s, and hazardous materials conditions are primarily associated with historic medical operations, aging buildings and site features, and legacy infrastructure (AECOM 2023 [Appendix G.1]). As shown in Figure 3.8-1, *Methane Zones and Methane Buffer Zones*, the majority of the main campus is located within a designated City of Los Angeles Methane Zone, which requires design-level mitigation for future development. The portion of the Project Site at the northwestern corner of the Kingston Avenue/Marengo Street intersection is within a designated City of Los Angeles Methane Buffer Zone (Citadel 2025b [Appendix G.2]; Geotechnologies 2025 [Appendix F.6]). Under Division 71 of the Los Angeles Building Code, properties located within a Methane Buffer Zone are subject to methane testing and evaluation prior to development. Unlike Methane Zones, which require prescriptive methane mitigation systems, Methane Buffer Zones require site-specific testing to determine whether methane is present at concentrations that warrant mitigation. If methane is detected above established regulatory thresholds, appropriate methane control measures must be incorporated into building design.

HISTORICAL USES

A Phase I Environmental Site Assessment (ESA) prepared by AECOM in 2023 evaluated a 34-acre subject property (Phase I ESA study area) within the larger approximately 81.9-acre Project Site. The study area includes the General Hospital Area (east of North State Street) and the West Campus Study Area (west of North State Street), including the Historic Tunnel and Pharmacy

Building. These areas are located within the boundaries of the Project Site evaluated in this Draft SEIR.

Historical sources reviewed as part of the Phase I ESA indicate that this portion of the campus has been used for medical and hospital-related operations since the late 1800s. Between 1918 and 1926, several support facilities were constructed in the eastern and northeastern portions of the Project Site, east of Building 502 (Pharmacy Building) and west of North State Street. These included a powerhouse with boilers and an engine room, incinerators, a paint shop, a machine/repair shop, a laundry building, and other ancillary shops. These buildings were damaged during the 1994 Northridge Earthquake and demolished by 2002 (AECOM 2023 [Appendix G.1]). Limited information is available regarding historic fuel storage, waste handling, or chemical use at these facilities. In the absence of subsurface investigations, these past uses represent potential environmental concerns (PECs)[1] for the eastern portion of the Project Site (AECOM 2023 [Appendix G.1]).

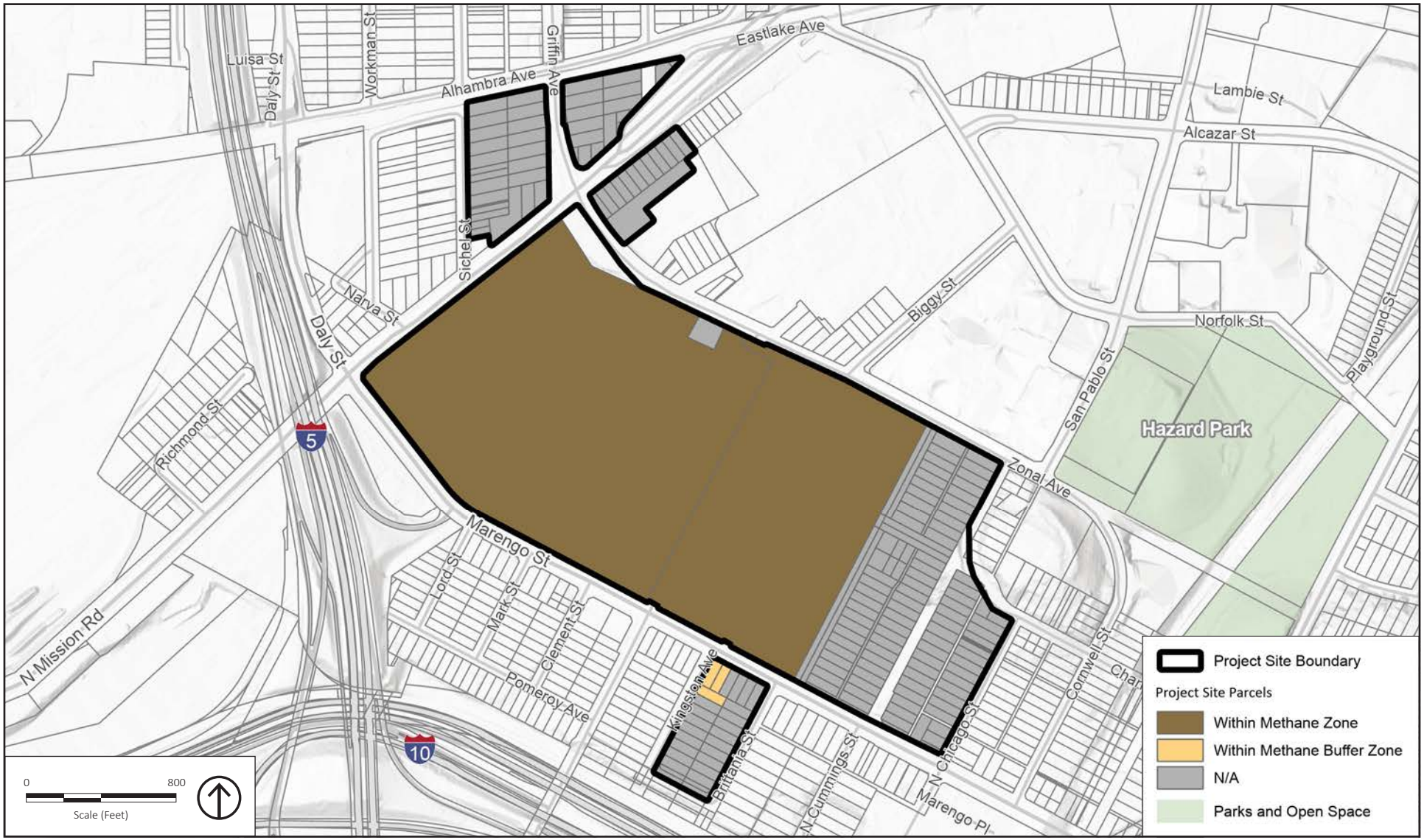
ENVIRONMENTAL DATABASE SEARCH

The Phase I ESA included a review of federal, State, and local environmental databases for hazardous materials sites at and near the Project Site. The database search identified the Project Site (1200 North State Street) as the site of a closed leaking underground storage tank (LUST) case that received regulatory closure in 2021. Despite case closure, AECOM determined that the Project Site represents a recognized environmental condition (REC)[2] because residual petroleum hydrocarbons remain in groundwater at concentrations above applicable maximum contaminant levels. The Phase I ESA further explained that dissolved-phase petroleum hydrocarbons in groundwater could migrate or pose a vapor encroachment condition (VEC) during future intrusive activities. Accordingly, although no further corrective action is currently required by the oversight agency, the presence of residual contamination and the potential for vapor intrusion mean the closed case still poses a potential hazard if disturbed during redevelopment (AECOM 2023 [Appendix G.1]).

[1] A potential environmental concern (PEC) is not a formal ASTM designation but is commonly used in Phase I ESAs to describe historical operations, features, or conditions that could have involved the use, storage, or disposal of hazardous substances, but where there is insufficient information to classify the issue as an REC.

[2] A recognized environmental condition (REC) is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to a release to the environment, conditions indicative of a release, or conditions that pose a material threat of a future release.

Figure 3.8-1 Methane Zones and Methane Buffer Zones



Source: City of Los Angeles 2025; PlaceWorks 2025.

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The database search also identified 19 additional LUST listings representing 15 unique off-site facilities located within a one-mile radius of the Project Site.[3] These facilities are primarily former gasoline stations, auto repair facilities, and light industrial uses. Most have received regulatory closure from the Los Angeles Regional Water Quality Control Board. The Phase I ESA determined that these off-site listings do not represent RECs or controlled recognized environmental conditions (CRECs)[4] for the Project Site. Although several sites had confirmed releases to soil or groundwater, each is located downgradient, separated by distance, or otherwise lacks a plausible migration pathway that could affect subsurface conditions beneath the Project Site. Specifically, the Phase I ESA evaluated groundwater flow direction, lateral separation distances, depth to groundwater, and the absence of documented contaminant plumes extending toward the Project Site. Available regulatory case files indicate that impacts were either remediated to regulatory closure standards or are confined to localized areas within the source properties without evidence of plume migration beyond property boundaries. In addition, no cross-gradient hydraulic connection or preferential pathway (e.g., utility corridors or continuous permeable strata) was identified that would facilitate migration toward the Project Site.

Many cases were closed following remediation, while others remain under regulatory oversight but are limited to localized impacts confined to the respective properties. The ESA concluded that, collectively, these off-site facilities reflect the historic intensity of petroleum use in the surrounding urban setting but do not pose an environmental concern specific to the Project Site (AECOM 2023 [Appendix G.1]). This conclusion is based on the Phase I ESA evaluation of groundwater flow direction, separation distance, regulatory closure status, and the absence of a complete migration pathway. As discussed further in the impact analysis below, compliance with applicable federal, State, and local regulations would ensure that any potential exposure during construction or operation would be appropriately managed and would not result in a significant hazard to the public or the environment. Therefore, only the closed on-site LUST case at the Project Site is considered an REC, and the off-site listings are not considered RECs or CRECs for the Project Site.

In addition to the LUST listings, the Project Site also appeared in the UST, Haznet, and RCRA Non-generator databases. These entries reflect routine hazardous materials use, storage, and disposal practices typical of a large medical campus, with no unresolved violations documented (AECOM 2023 [Appendix G.1]). A full summary of the RECs, CRECs, and PECs identified for the

[3] Consistent with ASTM E1527-21 standards for Phase I Environmental Site Assessments, environmental database searches are conducted using prescribed search radii (generally 0.5 mile for LUST sites and up to 1 mile for other regulatory listings). The one-mile radius reflects a conservative screening distance used to evaluate potential off-site sources and migration pathways.

[4] A controlled recognized environmental condition (CREC) refers to a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of a regulatory agency, but where residual contamination remains in place subject to controls such as land use restrictions, monitoring, or engineering barriers.

Project Site and relevant off-site listings evaluated as part of the Phase I ESA study area is provided in Table 3.8-1, *Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, and Potential Environmental Concerns Identified on the Project Site and Within a One-Mile Radius*.

UNDERGROUND STORAGE TANKS

The Phase I ESA study area overlaps the Project Site and contains four active USTs supporting emergency power generation: two 10,000-gallon diesel tanks located north of the Old General Hospital (Building 101) and two 40,000-gallon diesel tanks northeast of the West Central Power Plant (Building 516). All four tanks are located on the Project Site. These tanks were installed in 1995 and remain in use. Inspections conducted by the LAFD have documented numerous violations over the years, not all of which have been reported as resolved. As a result, the four active USTs are considered a REC in the Phase I ESA (AECOM 2023 [Appendix G.1]).

In addition to the active tanks, historical records document at least 13 former USTs (gasoline, diesel, and fuel oil) that were removed from the Project Site, as well as a 500-gallon solvent tank near Building 120. Some of these areas are associated with petroleum hydrocarbon releases, with residual contamination persisting in soil and groundwater (AECOM 2023 [Appendix G.1]; Citadel 2025b [Appendix G.2]).

ASBESTOS-CONTAINING MATERIALS AND LEAD-BASED PAINT

Multiple hazardous building materials surveys confirm the widespread presence of ACM and lead-based paint (LBP) at the Project Site. The Vanir investigation documented friable ACM within utility tunnels, particularly in thermal system insulation and surfacing materials (Vanir et al. 2013). The AECOM outbuilding survey evaluated 19 ancillary outbuildings on the General Hospital and West Campus portions of the Project Site, including storage sheds, garages, and small support facilities. The survey identified ACM in roofing felt, shingles, vinyl floor tiles, and exterior siding. LBP was detected in a variety of painted surfaces, including doors, window frames, and interior and exterior wall coatings. The report noted that several of the structures are in a deteriorated condition, with weathered or friable ACM and peeling LBP increasing the likelihood of release if disturbed. Collectively, these findings confirm that the outbuildings contain hazardous building materials (including ACM, LBP, and universal wastes) that will require abatement or other controls prior to demolition to prevent airborne emissions or soil contamination (AECOM 2023 [Appendix G.1]]).

Table 3.8-1 Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, and Potential Environmental Concerns Identified on the Project Site and Within a One-Mile Radius

REC/PEC Category	Location / Source	Details	Evaluation in the 2014 Master Plan EIR?	Status / Notes
On the Project Site				
Active USTs (REC)	North of Old General Hospital (Building 101); NE of West Central Power Plant (Building 516)	Four active USTs: two 10,000-gallon diesel tanks and two 40,000-gallon diesel tanks, installed 1995	**Yes**. Identified and evaluated in the 2014 Master Plan EIR which determined that compliance with federal, State, and local UST regulations and LAFD oversight would reduce impacts to less than significant.	Routinely inspected by Los Angeles Fire Department; history of violations, not all corrected
Former USTs (REC)	Multiple historic locations across Campus (including near Building 120)	At least 13 former gasoline, diesel, and fuel oil tanks removed; one 500-gallon solvent UST near Building 120	**Yes**. The 2014 Master Plan EIR required additional Phase II investigation of former and suspected UST locations (MM-HAZ-3).	Residual contamination persists in soil/groundwater near some locations
Closed LUST Case (REC/VEC)	On the Project Site (1200 N. State Street)	Former LUST case received regulatory closure in 2021	**Yes**. The 2014 Master Plan EIR Mitigation Measure HAZ-2 addressed the LUST site.	Residual petroleum hydrocarbons in groundwater above maximum contaminant levels remain
Soil Vapor / VOCs (REC)	West Campus maintenance yard (B-2); near USTs (B-12)	VOCs detected above residential screening levels	**No**. VOCs in soil vapor and vapor intrusion conditions were identified through post-2014 Phase I ESAs and Phase II investigations.	Requires management during excavation and redevelopment
Methane Gas (REC)	Entire Project Site (City-designated Methane Zone)	Methane detected at levels requiring mitigation	**No**. Methane conditions and required mitigation reflect updated technical studies conducted after 2014.	Redevelopment must incorporate methane mitigation

Table 3.8-1 Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, and Potential Environmental Concerns Identified on the Project Site and Within a One-Mile Radius

REC/PEC Category	Location / Source	Details	Evaluation in the 2014 Master Plan EIR?	Status / Notes
Petroleum Hydrocarbons in Soil (REC)	Various subsurface boring locations	Elevated TPH identified in fill soils with demolition debris	**Yes**. Soil and groundwater contamination were evaluated in the 2014 Master Plan EIR, including petroleum-related impacts associated with USTs. The 2014 Master Plan EIR identified potentially significant construction impacts related to soil and groundwater contamination and required Mitigation Measures MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3, which included additional subsurface investigation, regulatory agency coordination, and remediation or management of petroleum-contaminated soil and groundwater encountered during redevelopment and impacts were reduced to less than significant with mitigation.	Petroleum-related REC
Undocumented Fill (REC)	On the Project Site (subsurface borings/test pits)	Loose silty sands, clays, and debris (concrete, brick, lumber)	**No**. Undocumented fill was identified through more recent subsurface investigations and was not specifically evaluated in the 2014 Master Plan EIR.	Variable composition and contamination
Hazardous Building Materials (REC)	Utility tunnels; outbuildings; legacy structures	ACM in insulation/surfacing; ACM/LBP in outbuildings	**Yes**. Asbestos and lead-based paint were evaluated in the 2014 Master Plan EIR, and mitigation was adopted. Mitigation Measure MM-HAZ-1 required pre-demolition surveys for	Must be abated prior to demolition

Table 3.8-1 Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, and Potential Environmental Concerns Identified on the Project Site and Within a One-Mile Radius

REC/PEC Category	Location / Source	Details	Evaluation in the 2014 Master Plan EIR?	Status / Notes
			asbestos and lead-based paint, abatement by certified personnel, and compliance with South Coast AQMD Rule 1403 and applicable hazardous waste handling regulations prior to demolition or renovation. Impacts were reduced to less than significant with mitigation.	
Historic Institutional Ops (PEC)	Former powerhouse, incinerators, paint shop, machine shop, laundry (1918–1926 era)	Fuel sources unknown; no subsurface investigations performed	**Yes**. The 2014 Master Plan EIR required investigation of former boiler and powerhouse areas under MM-HAZ-3, with remediation or management of contamination identified during redevelopment. Impacts were reduced to less than significant with mitigation.	Potential concern due to unknown past use
Abandoned Oil Well (REC)	Southern portion of Project Site	Documented idle well present; not fully abandoned	**No**. The abandoned oil well condition was identified in more recent investigations.	Potential release pathway if disturbed
Other Database Listings (Routine)	On the Project Site (Regulatory database listings associated with the Campus address [UST, Haznet, RCRA Non-Generator])	Reflect routine hazardous materials management typical of medical campus	**Yes**. Regulatory database listings and hazardous materials management practices were evaluated in the 2014 Master Plan EIR. The 2014 Master Plan EIR required implementation of MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3 during construction to address hazardous materials handling and regulatory listings. Impacts were	No significant unresolved violations

Table 3.8-1 Recognized Environmental Conditions, Controlled Recognized Environmental Conditions, and Potential Environmental Concerns Identified on the Project Site and Within a One-Mile Radius

REC/PEC Category	Location / Source	Details	Evaluation in the 2014 Master Plan EIR?	Status / Notes
			reduced to less than significant with mitigation.	
Interim Occupancy Hazards (PEC)	On the Project Site (existing buildings and structures)	Deferred maintenance, deteriorated infrastructure, ACM/LBP present	**Partially**. Hazardous building materials were evaluated in the 2014 Master Plan EIR; however, deferred maintenance and interim occupancy conditions reflect current site conditions.	Potential for occupant exposure if not abated
Within a One-Mile Radius				
Off-Site LUSTs (CRECs)	Within 1-mile radius	19 additional listings (15 unique off-site facilities including gas stations, auto shops)	**Yes**. Off-site listings were reviewed in the 2014 Master Plan EIR as part of database and reconnaissance review. The 2014 Master Plan EIR concluded that off-site hazardous materials sites would not result in significant impacts to the Project Site, and no project-specific mitigation was required beyond compliance with applicable regulatory oversight. Impacts were determined to be less than significant.	Most cases closed; contamination remains in place under oversight

Notes: ACM = asbestos-containing materials; CREC = controlled recognized environmental condition; LBP= lead-based paint; LAFD = Los Angeles Fire Department; LUST = leaking underground storage tank; PEC = potential environmental concern; REC = recognized environmental condition; UST = underground storage tank; VEC = vapor encroachment condition; VOC = volatile organic compound

Sources: AECOM 2023 (Appendix G.1); Citadel 2025b (Appendix G.2); Geotechnologies 2025 (Appendix F.6); Vanir et al. 2013 (Appendix G.3); County of Los Angeles 2014.

HISTORICAL MEDICAL WASTES AND HOSPITAL EQUIPMENT

A separate hazardous building materials and environmental survey for the General Hospital (Building 101) is being conducted in support of the ongoing seismic retrofit and adaptive reuse program. That structure is expected to contain additional hazardous materials beyond ACM and LBP, including legacy medical equipment, chemical and biological residues, radiological sources, and other regulated wastes associated with historical hospital operations. All such materials will require identification and management in accordance with applicable federal, State, and local hazardous waste handling and disposal standards prior to renovation or reuse (AECOM 2023 [Appendix G.1]).

SOIL VAPOR, PETROLEUM, AND METHANE CONDITIONS

A Phase II Subsurface Investigation and Methane Survey conducted by Citadel confirmed the presence of petroleum hydrocarbons, volatile organic compounds (VOCs), and methane gas at the Project Site (Citadel 2025b [Appendix G.2]). Soil vapor sampling identified VOCs above residential screening levels in localized areas, particularly in the west campus maintenance yard and near existing USTs. Methane testing documented concentrations consistent with the City of Los Angeles-designated Methane Zone, indicating that subsurface gas management is required for redevelopment. Geotechnologies similarly observed petroleum-related impacts in fill soils containing demolition debris (Geotechnologies 2025 [Appendix F.6]).

OIL WELL HAZARDS

The 2025 Phase II ESA identified one abandoned oil well on the southern portion of the Project Site. Subsequent review of California Department of Conservation, CalGEM records indicates that the Santa Fe Springs Mutual Oil Syndicate Well No. 1 (API# 0403705846), located in the southern portion of the Project Site near Parking Lot 5 and along Marengo Street, was drilled between 1926 and 1927 to a depth of approximately 2,850 feet and was abandoned in 1927 due to lack of oil encountered. Although the well is identified as abandoned in available records, limited documentation regarding abandonment methods or standards is available. Idle or improperly abandoned wells present a risk of gas migration, vapor intrusion, and subsurface contamination if not properly remediated during redevelopment (Citadel 2025b [Appendix G.2]).

UNDOCUMENTED FILL

Subsurface investigations within localized areas of the Project Site identified undocumented fill containing demolition debris and construction waste (Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]; GPI 2022 [Appendix F.5]). This material was primarily encountered in shallow borings and test pits beneath former building pads, paved areas, and utility corridors where prior construction and demolition activities occurred. Undocumented fill refers to non-

engineered material of variable quality that was placed without compaction control or testing and may include a mixture of soil, debris, and construction byproducts of unknown origin. Because its composition is not fully characterized, undocumented fill can introduce uncertainty during redevelopment—it has the potential to contain building material fragments or petroleum-stained soils associated with past development activities.

The technical reports prepared for the Proposed Project do not classify undocumented fill as a REC or PEC, but they recommend that undocumented fill be properly characterized and managed during redevelopment to ensure compliance with regulatory standards (Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]).

EMERGENCY OPERATIONS AND EVACUATION CONTEXT

The Project Site itself is not designated as an emergency operations center (EOC) or community gathering place under the City of Los Angeles Emergency Operations Plan (City of Los Angeles 2023). Primary EOCs in the region are at the City's Emergency Operations Center in downtown Los Angeles (200 N. Spring Street) approximately 2 miles west, and at the Los Angeles County Emergency Operations Center in East Los Angeles (1275 N. Eastern Avenue) approximately 2 miles east, both of which are outside the Project Site (City of Los Angeles 2025).

Although the Project Site is owned by the County, it is located in the City of Los Angeles and receives emergency services from LAFD. As discussed in Chapter 3.13, *Public Services*, of this Draft SEIR, LAFD Stations 1 and 2 service the Project Site and are located 1.9 and 1.0 roadway miles, respectively, from the Project Site. It should be noted that development activities within the Project Site are subject to review and approval by the LACFD because the County retains ownership and operational control of the Project Site. Accordingly, LACFD is responsible for disaster preparedness and other services, such as building plan review, fire prevention, and fire hydrant testing within the boundaries of the Project Site.

The Project Site is served by multiple regional evacuation and emergency access routes. North-south regional access is provided by Interstate 5 (I-5) and the 110 freeway, less than one mile west of the Project Site, and I-710, about two miles east. East-west regional access is provided by I-10 (Santa Monica Freeway), which passes less than one mile south of the Project Site. According to the Los Angeles County General Plan Safety Element, I-5 and I-10 are designated Freeway Disaster Routes. In addition, Mission Road, Valley Boulevard, and Soto Street are designated Highway Disaster Routes (County of Los Angeles 2025). Locally, Mission Road, Marengo Street, and State Street provide direct emergency access to and around the Project Site. These routes are identified in the City's General Plan Safety Element and the County's All-Hazards Mitigation Plan as critical lifeline and evacuation corridors (County of Los Angeles 2023).

UNIVERSAL AND RADIOACTIVE WASTES

As part of the ERMs survey, an inspection was conducted to identify hazardous materials and wastes within the outbuilding structures (Citadel 2025a [Appendix G.4]). The survey area included various ancillary facilities such as maintenance and storage buildings associated with historical hospital operations, but did not include the General Hospital Building itself as that structure is being evaluated separately under its own hazardous materials assessment and seismic retrofit program. Although the General Hospital Building was not included in the ERMs survey scope, the Proposed Project does not anticipate separate or subsequent CEQA clearance for activities associated with that structure. Therefore, this Draft SEIR considers hazardous materials conditions within the General Hospital Building at a programmatic level, based on available information, to ensure that potential impacts associated with its adaptive reuse are addressed. Prior environmental documents, including the 2014 EIR, did not evaluate adaptive reuse of the General Hospital Building (Citadel 2025a [Appendix G.4]).

The inspection identified universal, electronic, and radioactive waste consistent with materials regulated under the Universal Waste Rule (22 CCR Division 4.5, Chapter 23). Radioactive wastes include tritium-containing exit signs in certain structures. These materials were observed in limited quantities across several outbuildings. Similar materials may also be present within the General Hospital Building based on its age and historical use; however, any such materials would be required to be managed, removed, and disposed of in accordance with applicable federal, state, and local regulations, including requirements of the California Department of Public Health Radiologic Health Branch and the California Code of Regulations.

PREVIOUSLY APPROVED 2014 MASTER PLAN AND IMPLEMENTATION STATUS

The Los Angeles County General Hospital Campus was previously evaluated under the certified 2014 Master Plan EIR, with subsequent addenda certified in 2017, 2023, and 2025. The 2014 Master Plan EIR analyzed campus-wide redevelopment, demolition of obsolete structures, infrastructure upgrades, seismic improvements, and phased buildout of medical and support facilities.

Since certification of the 2014 Master Plan EIR, several components of the previously approved Master Plan have been implemented or are underway. As described in Chapter 2, *Project Description*, completed or active components include demolition of the Women's and Children's Hospital structures, construction of Phase I and Phases IV and V of the Recuperative Care Village, planning for demolition of select West Campus structures, and seismic retrofit of the General Hospital. Certain demolition activities anticipated under the 2014 Master Plan but not yet implemented are carried forward and evaluated as part of the Proposed Project in this Draft SEIR.

Hazardous materials abatement, including removal of ACM, LBP, and other regulated building materials, has occurred in association with demolition and renovation activities conducted pursuant to the 2014 approvals. Prior demolition, grading, and infrastructure improvements have also resulted in disturbance and management of soils and subsurface materials in localized areas of the Campus. These activities were conducted in accordance with applicable regulatory requirements and site management protocols (e.g., soil management plans or similar procedures), which provide for the identification, handling, and disposal of potentially contaminated materials encountered during construction. While regulatory closure has been achieved for certain areas, residual contamination may remain at depth and would continue to be managed in accordance with applicable requirements during future ground-disturbing activities.

3.8.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section IX, states that the Proposed Project would result in a significant impact related to hazards and hazardous materials if it would:

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

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

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

d) Be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would result in a safety hazard or excessive noise for people residing or working in the project area.

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

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

METHODOLOGY

The analysis of hazards and hazardous materials in this section is based on a review of existing site conditions; environmental site assessments; subsurface investigations; and hazardous building materials surveys prepared for portions of the Project Site, including evaluations of ACM, LBP, PCBs, and radioactive and universal waste. The Phase I ESA included a regulatory database search, site reconnaissance, and a screening for vapor encroachment conditions (AECOM 2023 [Appendix G.1]). The Phase II and methane survey advanced soil borings, collected vapor samples, and characterized subsurface conditions for methane and VOCs (Citadel 2025b [Appendix G.2]). The utility tunnel study surveyed thermal system insulation and surfacing for ACM (Vanir et al. 2013). The geotechnical investigation evaluated subsurface soils, including fill and petroleum hydrocarbon presence (Geotechnologies 2025 [Appendix F.6]). The structural assessment included borings and sampling for subsurface conditions (GPI 2022 [Appendix F.5]). Applicable regulatory requirements were also reviewed, including federal and State hazardous materials management programs, County of Los Angeles Code of Ordinances provisions for hazardous waste and hazardous materials disclosure, and City of Los Angeles Methane Zone requirements.

Key considerations include the presence of hazardous building materials such as asbestos and lead; identified conditions related to USTs, soil vapor and methane, petroleum hydrocarbons, and VOCs in subsurface soils; undocumented fill containing demolition debris; and the presence of an abandoned oil well on the southern portion of the Project Site. These issues were documented in prior investigations and reflect potential hazards that could be encountered during demolition, grading, or redevelopment activities (AECOM 2023 [Appendix G.1]; Citadel 202a [Appendix G.4], 2025b [Appendix G.2]; Vanir et al. 2013 [Appendix G.3]; Geotechnologies 2025 [Appendix F.6]],; GPI 2022 [Appendix F.5]).

The evaluation follows the State CEQA Guidelines and applicable local policies and is informed by industry standards for environmental site assessment, hazardous materials management, and soil vapor mitigation design.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Section 3.1.4, *Project Impact Analysis*, and 3.1.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant hazards or hazardous materials impacts with implementation of standard regulatory requirements and mitigation measures related to hazardous building materials (asbestos and lead), soil and groundwater contamination, USTs, and emergency access during construction. Table 3.8-2, *Summary of the 2014 Master Plan Hazards and Hazardous Materials Impact Conclusions*, provides an overview of previous hazards and hazardous materials impact analyses for the Project Site.

Table 3.8-2 Summary of the 2014 Master Plan EIR Hazards and Hazardous Materials Impact Conclusions

Significance Criteria [1]	Significance without Mitigation	Mitigation Measure [2]	Significance with Mitigation
HAZ-1: Create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.	Potentially Significant (construction) Less Than Significant (operation)	MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3	Less Than Significant
HAZ-2: Create a significant hazard to the public or environment through reasonably foreseeable upset/accident involving hazardous materials.	Potentially Significant (construction) Less Than Significant (operation)	MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3	Less Than Significant
HAZ-3: Emit hazardous emissions or handle hazardous materials within 0.25 mile of a school.	Potentially Significant (construction) Less Than Significant (operation)	MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3	Less Than Significant
HAZ-4: Be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.	Potentially Significant (construction) Less Than Significant (operation)	MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3	Less Than Significant
HAZ-5: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Potentially Significant (construction) Less Than Significant (operation)	MM-PS-1 and MM-TRAF-1	Less Than Significant
HAZ-6: Expose people or structures to a significant risk of loss, injury, or death involving wildland fire.	The lead agency determined in the NOP/IS that the 2014 Master Plan would result in no impacts in this area, and it was therefore screened from further review in the 2014 Master Plan EIR.		

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.8.4 Project Impact Analysis

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

Construction

Construction and phased demolition of existing buildings and structures would involve the routine handling, transport, and disposal of hazardous materials. Investigations across the Project Site have confirmed the presence of ACMs, LBPs, petroleum hydrocarbons, VOCs, methane, undocumented fill containing demolition debris, and an idle oil well, as well as limited occurrences of low-level radioactive waste associated with former medical and laboratory activities (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [[Appendix G.1]]; Citadel 2025a [Appendix G.4], 2025b [Appendix G.2]; Geotechnologies 2025 [Appendix F.6]; GPI 2022 [Appendix F.5]). Most existing buildings on the Project Site are slated for demolition due to age, condition, and outdated seismic design. Several structures are expected to remain, including the General Hospital Building (undergoing seismic retrofit), the Patient's Building (#102), the Visitor/Admin Building (#103), and the Telephone Exchange Building (#308). Adaptive reuse of the General Hospital Building would include soft demolition activities which would include the removal of old furniture (e.g., tables, chairs, wheel chairs, old medical operational facility furnishings, debris, cardboard boxes, trash, sandbags, storage containers, fans, tools, old documents, office equipment, etc.) and non-essential and non-historical elements (e.g., outdated/deteriorating mechanical, electrical, and plumbing systems, interior finishes, partition walls, flooring, ceilings, and other non-loadbearing components), while avoiding and preserving character defining features and core structural components. The General Hospital Building would be re-roofed and new mechanical equipment and outdoor patios would be added. A portion of the north elevation at the basement and 1st to 3rd floors would be demolished to accommodate the integration of a new parking garage. Along the south elevation of the 1st floor, new openings would be created at the west and east ends of a concrete retaining wall and would provide access to the lobby. Critical seismic strengthening would occur including new foundations at the basement level, new shear walls at all floors requiring demolition, and reconstruction at corridors. New reinforced concrete super walls would avoid high integrity historic spaces within the building and help limit the amount of earthquake movement that would affect exterior elevations. Following completion of seismic retrofit and rehabilitation, the General Hospital Building is anticipated to accommodate a mix of uses, which may include residential, retail, restaurant, educational, and office uses.

Buildings that would be demolished have been documented to contain asbestos and lead-based paint, which must be abated prior to removal (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [Appendix G.1]; GPI 2022 [Appendix F.5]; Geotechnologies 2025 [Appendix F.6]). Due to the age of the General Hospital Building, the components proposed for soft demolition are anticipated

to contain ACMs and LBPs. The Phase I ESA also noted that ACMs and LBPs are also present in some structures expected to remain; therefore, any future renovation or remodeling of these buildings would also encounter hazardous materials requiring abatement (AECOM 2023).

Subsurface investigations have documented VOCs in soil vapor above screening levels, petroleum hydrocarbons in shallow soils, and methane conditions within mapped Methane Zones, all of which would be encountered during grading and excavation (Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]). The closed LUST case at the Project Site remains an REC due to residual petroleum hydrocarbons in groundwater above regulatory thresholds and the potential for vapor encroachment during intrusive activities (AECOM 2023 [Appendix G.1]). Contaminated soils and vapors associated with residual petroleum hydrocarbons and VOCs would be encountered during grading, excavation, and other ground-disturbing activities (AECOM 2023 [Appendix G.1]; Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]).

The hazardous building materials surveys identified small quantities of radioactive materials within certain outbuilding structures on the Project Site (e.g., tritium-containing exit signs), consistent with historical hospital and laboratory operations. Radioactive waste is regulated under the Universal Waste Rule (22 CCR Division 4.5, Chapter 23) and subject to management requirements under both DTSC universal waste provisions and U.S. Nuclear Regulatory Commission regulations governing radioactive materials. These materials are subject to special management and recycling standards established by DTSC to facilitate proper collection and disposal. Any such materials encountered during demolition or grading would be handled, stored, and disposed of under the oversight of the Los Angeles County Department of Public Health Radiation Management Unit and in accordance with applicable U.S. Nuclear Regulatory Commission standards. The ERMs survey identified tritium-containing exit signs within the Pharmacy Building, Parking Structure 10, and the utility tunnel (Citadel 2025a [Appendix G.4]). Demolition of these structures would therefore require removal and proper management of radioactive materials in accordance with applicable regulatory requirements. Although the General Hospital Building was not included in the ERMs survey, similar materials may be present within the building due to its age and history of medical and laboratory use. Any such materials encountered during demolition, renovation, or adaptive reuse activities would likewise be managed in accordance with applicable regulatory requirements.

In addition, undocumented fill containing demolition debris and construction waste has been identified in shallow borings and test pits in localized areas of the Project Site (Citadel 2025; Citadel 2025b; GPI 2022 [Appendix F.5]). This non-engineered material could contain building material fragments or petroleum-stained soils, creating uncertainty during excavation and grading. Proper handling and disposal of this fill would, therefore, be required to prevent exposure and off-site transport. Because demolition and grading across the Project Site would disturb widespread hazardous building materials, soils with petroleum hydrocarbons and VOCs, and methane in subsurface conditions, construction activities would be subject to applicable federal, State, and regulatory requirements. Hazardous building materials such as asbestos and

lead must be identified and abated in accordance with South Coast AQMD Rule 1403 and CDPH regulations. Petroleum hydrocarbons and VOCs encountered in soil and soil vapor must be managed under oversight of the Los Angeles RWQCB and in compliance with California hazardous waste handling requirements. Methane conditions must be addressed in accordance with City of Los Angeles Methane Zone regulations, which require site testing, mitigation design, and installation of appropriate barriers and venting systems.

Despite compliance with these regulatory requirements including abatement of hazardous building materials, management of contaminated soils and vapors, and implementation of methane control systems required under the Los Angeles Building Code, demolition and grading activities across the Project Site would still involve widespread disturbance of hazardous materials. As a result, the potential for exposure and off-site transport of hazardous substances during construction remains substantial. Implementation of the approved Soil Management Plan (SMP) would further govern handling, segregation, testing, stockpiling, transport, and disposal of contaminated soil and groundwater encountered during grading and excavation (Citadel 2026). The SMP establishes worker protection requirements, dust control measures, confirmation sampling protocols, and procedures for off-site disposal at appropriately licensed facilities under applicable regulatory oversight.

The Phase I ESA also identified one abandoned oil well on the southern portion of the Project Site (AECOM 2023 [Appendix G.1]). Idle or improperly abandoned wells can act as conduits for gas migration, including methane and other hydrocarbons, creating risks of vapor intrusion, explosion hazards, and localized soil and groundwater contamination. Because no documentation confirming proper abandonment was available at the time the report was prepared, redevelopment activities involving grading or excavation in this area could encounter hazardous conditions associated with the idle well.

Potential disturbance of on-site hazards during construction is considered potentially **significant**.

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

> **Mitigation Measure HAZ-1a:** In order to minimize exposure, prior to demolition activities, asbestos-containing materials and lead-based paint surveys and evaluations shall be conducted in buildings that are to be demolished or renovated. Hazardous building materials surveys have been conducted for many Project Site structures; however, because demolition would occur in phases and certain materials are concealed within wall assemblies, mechanical systems, and other building components that cannot be fully accessed until demolition preparation activities occur, final comprehensive pre-demolition surveys consistent with South Coast Air Quality Management District

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

Mitigation Measure HAZ-1b: Prior to start of construction, construction activities that involve subsurface disturbance within areas of the Project Site where residual petroleum hydrocarbons and volatile organic compounds (VOCs) in groundwater have been identified or are reasonably expected to be present, including areas downgradient of the former leaking underground storage tank (LUST) location at 1200 North State Street shall account for residual petroleum hydrocarbons and VOCs in groundwater that remain following regulatory closure of the former leaking underground storage tank case. A qualified environmental professional shall evaluate the potential for vapor encroachment conditions (VEC) and specify appropriate management measures, which may include removal and disposal of contaminated soil, groundwater management, vapor mitigation, or other remedial actions, consistent with regulatory requirements and recommendations of the Phase II ESA. The management measures shall be implemented during soil disturbing activities.

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

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

Because existing structures, pavement, utilities, and active campus operations currently limit full access to the well location and its area of potential influence, comprehensive field verification and intrusive investigation cannot be completed at this time. The final grading limits, excavation depths, and site access conditions will not be fully known until demolition and site clearance activities occur. Therefore, confirmation of abandonment status and any necessary subsurface investigation must occur immediately prior to grading in the affected area, once safe and unobstructed access is available.

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

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HAZ-1a (asbestos and lead surveys and abatement); Mitigation Measure HAZ-1b (management of residual contamination and potential vapor encroachment at 1200 North State Street); Mitigation Measure HAZ-1c (Phase II ESA with remediation of USTs, boilers, and powerhouse areas); and Mitigation Measure HAZ-1d (evaluation and, if necessary, the abandoned oil well would be properly plugged and sealed in accordance with CalGEM standards); and implementation of the approved SMP governing contaminated soil and groundwater handling during grading and excavation, would reduce impacts related to the routine transport, use, and disposal of hazardous materials to less than significant levels. These measures address the range of hazardous materials concerns identified for the Proposed Project, including ACM, LBP, subsurface contamination, petroleum hydrocarbons, vapor intrusion risks associated with redevelopment, undocumented fill, and soil management requirements. Compliance with federal, State, and local regulatory requirements, together with the implementation of Proposed Project-specific abatement and remediation plans, would help make sure that hazardous materials are identified, handled, transported, and disposed of in accordance with established health and safety standards. Therefore, the Proposed Project's potential to create a significant hazard to the public or environment through routine hazardous materials

management would be less than significant with the implementation of Mitigation Measure HAZ-1a through HAZ-1d.

Operation

The Proposed Project includes a mix of residential, general and medical office, commercial/retail, hospitality, community benefit, educational, warehouse, clean tech/advanced industrial, hospital, parking, open space, and supporting infrastructure uses. Operational hazardous materials use would occur in connection with these uses and would include medical and laboratory supplies, cleaning agents, maintenance products, fuels, and small quantities of commercial and household products. Biomedical and medical waste generated by hospital functions would continue to be produced during long-term operation and must be managed as part of ongoing campus activities (County of Los Angeles 2014; AECOM 2023 [Appendix G.1]).

Residential, retail, hospitality, education, warehouse, and clean tech/advanced industrial facilities would involve the routine presence of hazardous materials in small-scale applications typical of these land uses. These materials include consumer and business-grade products such as solvents, paints, and industrial supplies, which would be stored, used, and disposed of on the Project Site in connection with normal operational needs. Collectively, these land uses would contribute to the ongoing transport, use, and disposal of hazardous materials within and around the Project Site.

Subsurface investigations have also documented the presence of VOCs in soil vapor at concentrations above screening levels within portions of the Project Site proposed for residential and commercial redevelopment (Citadel 2025b [[Appendix G.2]]; Geotechnologies 2025 [Appendix F.6]). These conditions present a potential pathway for vapor intrusion into new occupied structures if not mitigated through engineering controls.

The diverse land uses proposed throughout the Project Site would generate, store, and dispose of hazardous materials on a routine basis, including medical waste streams from hospital functions, commercial chemicals from research and industrial uses, and smaller-scale but widespread use of consumer and maintenance products across residential and community-serving facilities. These activities are subject to federal and State regulatory programs, including hazardous waste management under the RCRA, medical waste regulation under the California Medical Waste Management Act, and hazardous materials disclosure and business plan requirements under the County of Los Angeles Fire Code. These programs would govern routine handling, storage, and disposal of hazardous materials during operation of the Proposed Project. However, the potential for vapor intrusion due to VOCs in soil vapor, which would particularly affect the proposed new residential and commercial development, represents an additional operational hazard not fully addressed by existing regulatory programs. Therefore, this impact would be considered potentially **significant**.

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

> **Mitigation Measure HAZ-2**: Prior to the issuance of building permits for any new residential or commercial structure on portions of the Project Site where volatile organic compounds (VOCs) in soil vapor have been documented above applicable screening levels, the Project Applicant(s) shall prepare and implement a vapor intrusion mitigation plan. The plan shall include site-specific engineering controls, such as passive or active sub-slab depressurization systems, vapor barriers, or equivalent measures designed to prevent intrusion of VOCs into occupied indoor spaces.
>
> Because final building footprints, foundation designs, and finished grades have not yet been determined, a structure-specific vapor mitigation system cannot be finalized at this time. Therefore, the vapor intrusion mitigation plan shall be prepared for each applicable structure once final design plans are available and prior to permit issuance.
>
> The vapor intrusion mitigation plan shall be prepared by a qualified environmental professional in consultation with the Los Angeles Department of Building and Safety (LADBS) as the permitting authority, and, as applicable, Los Angeles County Public Works, and the Los Angeles Regional Water Quality Control Board (RWQCB). Design features shall comply with City of Los Angeles Methane Zone requirements, CalEPA guidance, and RWQCB performance standards for VOC mitigation.
>
> Implementation of the plan, including installation of all required engineering controls, shall be verified through inspections and post-installation testing prior to occupancy. LADBS, in coordination with the RWQCB, shall review and approve the plan, confirm proper installation, and enforce compliance as part of the standard building permit and inspection process.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HAZ-2 (vapor intrusion mitigation plan for VOCs in soil vapor at future residential and commercial structures) would apply during project design and building permit review and would be implemented prior to occupancy of new structures. This measure addresses the VOCs associated with redevelopment, undocumented fill, and soil management requirements. Compliance with federal, State, and local regulatory requirements, together with the implementation of project-specific abatement and remediation plans, would help make sure that hazardous materials are identified, handled, transported, and disposed of in accordance with established health and safety standards. Therefore, the Proposed Project's potential to create a significant hazard to the public or environment through routine hazardous materials management would be less than significant with the implementation of Mitigation Measure HAZ-2.

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

Construction

Construction and phased demolition would involve activities with an elevated potential for accidental release of hazardous materials, including removal and handling of ACMs and LBP from aging structures and tunnels documented to contain friable ACM and deteriorated mechanical systems (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [Appendix G.1]). Subsurface work would intersect areas where soil vapor investigations identified volatile organic compounds above screening levels, shallow petroleum hydrocarbons, and methane within a mapped Methane Zone, increasing the potential for vapor or contaminated-soil releases during excavation and utility work (Citadel 2025b [Appendix G.2]; Geotechnologies 2025 [Appendix F.6]). Site investigations also identified undocumented fill with demolition debris and an idle oil well on the southern portion of the Project Site, which present additional pathways for accidental release of contaminants or gases if encountered or disturbed during grading and foundation activities (GPI 2022 [Appendix F.5]; Citadel 2025b [Appendix G.2]). The idle oil well would be subject to CalGEM well abandonment requirements under Public Resources Code Sections 3208 to 3217 and implementing regulations (14 CCR secs. 1713–1723), which require wells to be properly plugged or sealed with cement plugs, gas-tight seals, and verification testing to prevent gas migration or vapor intrusion.

Many existing buildings on the Project Site are slated for demolition due to age and condition, and investigations confirm that hazardous building materials and deteriorated infrastructure are present and would be encountered during demolition and construction activities (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [Appendix G.1]; GPI 2022 [Appendix F.5]; Geotechnologies 2025 [Appendix F.6]). Demolition and grading would disturb asbestos-containing materials, lead-based paint, contaminated soils and vapors, methane in subsurface conditions, and infrastructure. These activities are subject to regulatory requirements, including South Coast AQMD Rule 1403 for asbestos, California Department of Public Health requirements for lead-based paint, Los Angeles RWQCB oversight for contaminated soils and vapors, City of Los Angeles Methane Zone regulations for methane, CalGEM well abandonment standards for idle oil wells, and implementation of the approved SMP, which establishes procedures for soil segregation, dust suppression, monitoring, and proper handling and disposal of contaminated materials. Despite compliance with these requirements and implementation of the SMP, the potential for reasonably foreseeable upset and accidental release during construction is substantial. Therefore, this impact would be considered potentially **significant**.

Impact HAZ-3: During construction, the Proposed Project could result in reasonably foreseeable upset and accidental release of hazardous materials through hazardous materials handling, building demolition, and disturbance of contaminated soils and subsurface conditions.

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

Significance with Mitigation: Less than significant. HAZ-1a (asbestos and lead surveys and abatement prior to demolition); HAZ-1b (management of residual contamination and vapor encroachment at 1200 North State Street); HAZ-1c (additional subsurface investigations and remediation of former and suspected UST locations and other historic infrastructure); HAZ-1d (evaluation and, if necessary, the idle oil well would be properly plugged and sealed in accordance with CalGEM standards); and HAZ-2 (vapor intrusion mitigation plan for VOCs in soil vapor at future residential and commercial structures); would reduce impacts related to the accidental release of hazardous materials from buildings, subsurface contamination, and RECs to less than significant levels. These measures address the range of hazardous materials concerns identified for the Proposed Project, including ACM, LBP, USTs, petroleum hydrocarbons, VOCs methane, undocumented fill, and the idle oil well. Compliance with federal, State, and local regulatory requirements, together with implementation of the surveys, investigations, engineering controls, well evaluation, and SMP required under Mitigation Measures HAZ-1a through HAZ-1d and HAZ-2, would help make sure that hazardous materials are identified, handled, transported, and disposed of in accordance with established health and safety standards. Therefore, the Proposed Project's potential to create a significant hazard to the public or environment through accidental hazardous materials release during construction and demolition would be **less than significant** with the implementation of Mitigation Measure HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2.

Operation

Long-term operation would involve the continued use, storage, and on-site transfer of hazardous materials associated with hospital and medical functions (including biomedical wastes), laboratories, maintenance activities, and other campus uses that routinely employ chemicals, solvents, fuels, and related products (AECOM 2023 [Appendix G.1]). These hazardous materials are similar in type and quantity to those already managed on the Project Site and would remain subject to strict federal, State, and local regulatory programs that govern storage, handling, and disposal. Biomedical and hazardous waste streams at the Medical Center are

already managed under comprehensive regulatory protocols, and these practices would continue during future operations (County of Los Angeles 2014; AECOM 2023 [Appendix G.1]). The Project Site is located within a City of Los Angeles–designated Methane Zone, and subsurface investigations have identified volatile organic compounds in soil vapor above screening levels in certain areas of the Project Site (Citadel 2025b [Appendix G.2]). Continued operation of new residential or commercial structures in these areas, as well as ongoing use and storage of hazardous materials, could create reasonably foreseeable upset or accidental release conditions if not properly managed in accordance with applicable standards.

Therefore, operation of the Proposed Project could create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. As such, this impact would be considered potentially **significant**.

Impact HAZ-4: During operation, the Proposed Project could involve the continued use, storage, and handling of hazardous materials and could create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release conditions during operation absent mitigation.

Mitigation: Implement Mitigation Measure HAZ-2.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HAZ-2 would require that potential vapor intrusion risks associated with documented VOCs in soil vapor are addressed through preparation and enforcement of a vapor intrusion mitigation plan incorporating appropriate engineering controls. In addition, operation of the Proposed Project would continue under established federal, State, and local hazardous materials management requirements and existing campus biomedical waste protocols. Compliance with these regulatory programs and implementation of Mitigation Measure HAZ-2 would reduce the potential for reasonably foreseeable upset or accidental release during operation. Therefore, this impact would be considered **less than significant**.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?

Construction

There are no K–12 schools identified on the Project Site itself. However, there is an existing licensed child development center on the Project Site, which is operated by the Child Development Consortium of Los Angeles. Additionally, the Project Site is within one-quarter mile of Francisco Bravo Medical Magnet Senior High School (0.2 mile east of the Project Site) and the East Los Angeles Occupational Center (0.1 mile southeast of the Project Site). The Proposed Project could also include development of a K-12 school on the Project Site; however,

because that facility is part of the Proposed Project, it is not considered an off-site sensitive receptor under this threshold, which evaluates potential impacts to nearby existing schools rather than internal project components that would be subject to project design, mitigation, and subsequent regulatory review.

While the specific location, design, and construction schedule for this facility have not yet been determined, future development would evaluate site-specific conditions, including proximity to hazardous materials, potential vapor intrusion, and construction-related emissions consistent with all mitigation measures outlined in this Draft SEIR. This review would incorporate applicable regulatory requirements and standard design and operational controls such that the school would not be exposed to hazardous emissions or materials.

Construction and demolition would involve activities with the potential to emit hazardous emissions or release hazardous building materials in proximity to these schools. Demolition and abatement of these structures could generate airborne fibers or dust if not properly managed. Subsurface investigations have also documented volatile organic compounds in soil vapor above screening levels, petroleum hydrocarbons, methane, and undocumented fill containing demolition debris (Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]; GPI 2022 [Appendix F.5]). Extensive demolition of deteriorated buildings across the Project Site has been documented, and many of these structures contain hazardous building materials, such as asbestos and lead-based paint, that must be abated prior to redevelopment (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [[Appendix G.1]]).

Because demolition and grading would occur within one-quarter mile to existing schools and could emit hazardous emissions or disturb hazardous materials that may migrate off-site, the potential for significant impacts during construction is substantial. Therefore, this impact would be considered potentially **significant**.

Impact HAZ-5: The Proposed Project would have the potential to result in significant impacts during construction related to hazardous emissions and handling of hazardous materials within one-quarter mile of existing schools.

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HAZ-1a (asbestos and lead surveys and abatement prior to demolition) would help make sure that hazardous building materials are properly identified and removed by certified professionals, preventing emissions of asbestos fibers or lead dust that could otherwise migrate

off-site toward nearby schools (Vanir et al. 2013 [Appendix G.3]; AECOM 2023 [Appendix G.1]). Implementation of Mitigation Measures HAZ-1b (management of residual contamination and vapor encroachment at 1200 North State Street); HAZ-1c (subsurface investigations and remediation of former and suspected USTs, boilers, and powerhouse areas); and HAZ-1d (evaluation and, if necessary, the documented abandoned oil well would be properly plugged and sealed to prevent gas migration and release during grading) would help make sure that subsurface contamination, including petroleum hydrocarbons, VOCs, and potentially contaminated fill, and oil well–related hazards, is identified and addressed under qualified oversight (GPI 2022 [Appendix G.3]; Citadel 2025b [Appendix G.2]).

Together, these measures address the full range of hazardous materials concerns identified for the Proposed Project, including ACM, LBP, USTs, petroleum hydrocarbons, VOCs, undocumented fill, methane, and oil well hazards. Compliance with federal, State, and local regulatory requirements, together with the implementation of the surveys, investigations, engineering controls, remediation actions, and soil management requirements identified in Mitigation Measures HAZ-1a through HAZ-1d, would require that hazardous materials are properly identified, managed, and disposed of. Therefore, the Proposed Project's potential to emit hazardous emissions or handle hazardous materials within one-quarter mile of Francisco Bravo Medical Magnet High School and the East Los Angeles Occupational Center would be **less than significant** with the implementation of Mitigation Measure HAZ-1a through HAZ-1d.

Operation

Long-term operation of the Proposed Project would include hospital, medical office, research, residential, retail, educational services (including a school use), and other community-serving uses. Hazardous materials associated with these uses would include biomedical wastes, laboratory chemicals, cleaning products, fuels, and maintenance supplies (AECOM 2023 [Appendix G.1]). Although the Project Site is within one-quarter mile of Francisco Bravo Medical Magnet Senior High School and East Los Angeles Occupational Center, operational hazardous materials handling would occur under established biomedical waste and hazardous materials management programs, including on-site segregation, labeling, storage, and disposal of medical waste in compliance with the California Medical Waste Management Act, and HMBP reporting to the LACoFD. These programs already govern activities on the Project Site and require routine inspections, tracking, and oversight to require safe handling and off-site disposal at licensed facilities (County of Los Angeles 2014; AECOM 2023 [Appendix G.1]). In addition, operation of the proposed on-site elementary school would involve the routine use of consumer-grade cleaning supplies, maintenance products, and small quantities of classroom-related materials. These products are common to educational facilities and would be subject to the same HMBP reporting and oversight requirements that apply to other campus uses, ensuring that their storage, use, and disposal would occur in accordance with applicable health and safety standards.

Because operational hazardous materials use is routine, small in scale, and subject to strict regulatory oversight, the potential for emissions or off-site releases affecting nearby schools is low. Therefore, this impact would be considered **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

d) Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Construction

The Project Site is listed on State regulatory databases pursuant to Government Code Section 65962.5 due to the presence of active USTs, historic LUST cases, residual petroleum hydrocarbons, and inclusion within a City-designated Methane Zone (AECOM 2023 [Appendix G.1]; Citadel 2025b [Appendix G.2]; Geotechnologies 2025[Appendix F.6]; GPI 2022 [Appendix F.5]). Four active diesel USTs installed in 1995 remain in service and have a documented history of violations noted by the LAFD, some of which were not confirmed as corrected (AECOM 2023 [Appendix G.1]). In addition, multiple former USTs and a closed LUST case at the Project Site were identified, with residual petroleum hydrocarbons in groundwater above regulatory screening levels (AECOM 2023 [Appendix G.1]).

Subsurface investigations at the Project Site further documented VOCs in soil vapor above residential screening levels, elevated total petroleum hydrocarbons in shallow soils, undocumented fill with demolition debris, and methane conditions requiring mitigation (Citadel 2025a [Appendix G.4]; Citadel 2025b [Appendix G.2]). A documented idle oil well on the southern portion of the Project Site presents another potential hazard pathway (AECOM 2023 [Appendix G.1]). Demolition, grading, and excavation could encounter and disturb these conditions, creating potential exposure pathways to construction workers, nearby receptors, and the surrounding environment. Because redevelopment would occur on a site included on hazardous materials regulatory lists with confirmed contamination and ongoing UST operations, the potential for exposure during construction is considered substantial. Therefore, this impact would be considered potentially **significant**.

Impact HAZ-6: Construction activities for the Proposed Project would be located on a site included on hazardous materials regulatory lists and could create a significant hazard to the public or environment during demolition, grading, and excavation absent mitigation.

> **Mitigation**: Implement Mitigation Measures HAZ-1a through HAZ-1d (as described under Impact HAZ-1) and Mitigation Measure HAZ-2 (as described under Impact HAZ-2) would apply to this impact. These measures collectively address hazardous building materials, residual subsurface contamination, USTs/LUSTs, VOCs in soil vapor, methane,

undocumented fill, and the idle oil well, ensuring that hazards associated with the Project Site's regulatory listings are mitigated.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2 would reduce impacts associated with RECs, including USTs, residual petroleum hydrocarbons, VOCs, methane, and the idle oil well, to less than significant levels. Together, these mitigation measures address the full range of hazardous conditions identified for the Proposed Project, ensuring that hazardous materials are identified, managed, and remediated consistent with regulatory standards and industry best practices. Therefore, the Proposed Project's potential to create a significant hazard due to its location on a listed hazardous materials site would be **less than significant** with the implementation of Mitigation Measure HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2.

Operation

During long-term operation, the Project Site would continue to include active UST systems used for emergency power generation and remain within a mapped Methane Zone (AECOM 2023 [Appendix G.1]; Citadel 2025b [Appendix G.2]). Routine monitoring, testing, and regulatory oversight would be required to ensure compliance with SWRCB, LAFD, and City methane mitigation requirements. However, operational activities would not involve disturbance of known contamination or legacy fill soils. Therefore, with appropriate mitigation and compliance with ongoing regulatory oversight, the potential for significant hazards during operation would be reduced to **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

e) For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Construction

The Project Site is located in the urban core of the City of Los Angeles near downtown and is not within two miles of a public airport or public use airport. The nearest facilities are Los Angeles International Airport (LAX), located approximately 15 miles southwest, and Bob Hope (Hollywood Burbank) Airport, located about 16 miles northwest. The Proposed Project includes demolition of the existing emergency helipad and construction of a new helipad to support hospital emergency operations. Construction activities associated with this helipad would be limited to the Project Site and would not introduce new flight operations or alter established flight paths during construction. The helipad is a private, on-site facility used for emergency medical transport and not a public or commercial aviation use. Construction of the new helipad

would be subject to Federal Aviation Administration (FAA) notification and design requirements under 14 CFR Part 77 and FAA Advisory Circular 150/5390-2C (Heliport Design), which establish standards for airspace protection, approach/departure surfaces, lighting, and markings. Compliance with these FAA standards would require that helipad demolition and reconstruction do not pose a hazard to air navigation or surrounding land uses (FAA 2023). As such, construction activities would not expose workers or the public to safety hazards or excessive noise associated with airport operations. Therefore, this impact would be **less than significant**.

Operation

Long-term operation of the Proposed Project would similarly not result in airport-related safety hazards or noise exposure for future residents, employees, patients, or visitors. The Project Site is outside the influence area of any airport land use compatibility plan, and no private airstrips are located within two miles of the Project Site. Operation of the replacement helipad would continue to be regulated under FAA and LAFD requirements for emergency medical heliports, ensuring that flight operations, lighting, and airspace clearances remain consistent with applicable safety standards (FAA 2023; LAFD 2025). Noise and safety conditions associated with airport operations would not affect the Project Site during operation. Therefore, this impact would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction

Construction activities could temporarily impair and/or interfere with emergency response access in the vicinity of the Project Site because of possible temporary lane closures, detours, and construction-related traffic.

In addition to new demolition and construction activities proposed under the 2014 Master Plan, the Proposed Project includes demolition of buildings previously approved for removal under the 2014 Master Plan EIR that have not yet been implemented. As described in Chapter 2, *Project Description*, demolition of select West Campus structures and other previously identified buildings is anticipated to begin in 2026 and would occur in phases over the 25-year buildout period. Accordingly, overlapping demolition, grading, and construction activities could occur in different portions of the Project Site during certain phases of implementation.

Concurrent construction activities could result in overlapping traffic, staging, and temporary access modifications within and adjacent to the Project Site. Without coordination, such overlap

could increase the potential for temporary disruption to emergency vehicle access. This impact would be temporary but is nonetheless considered potentially **significant**.

Impact HAZ-7: Construction activities for the Proposed Project could temporarily impair and/or interfere with emergency response access.

Mitigation: Implement Mitigation Measures TRAF-1 and TRAF-4.

Significance with Mitigation: Less than significant. As noted in Section 3.8.2, *Existing Conditions*, the Project Site is not itself identified as an EOC or community gathering place, but it is in an urbanized area served by designated evacuation routes. Construction traffic management measures would therefore be critical to maintaining regional and local emergency access. Additionally, construction would include replacement of the on-site emergency helipad, which serves as a key access point for regional emergency medical transport (FAA 2024; LAFD 2025). With implementation of Mitigation Measure TRA-1 (Worksite Traffic Control Plan) and Mitigation Measure TRA-4 (emergency access coordination during construction), impacts would be reduced to less than significant (see mitigation measures in Chapter 3.15, *Transportation*).

Operation

New buildings proposed under the proposed Master Plan would be designed to conform to LACoFD standards for emergency ingress/egress and clearances, and the new buildings would be integrated into the existing emergency response plan and emergency evacuation plan for the Project Site. As described above, the Project Site operates within the framework of the County of Los Angeles Operational Area Emergency Response Plan and the City of Los Angeles EOP, which establish coordinated procedures for disaster response, evacuation, and interagency coordination applicable to County facilities located within the City. The LACoFD reviews building plans to conform with LACoFD standards as part of the standard building plan approval process. As described in the Existing Conditions section, while the Project Site is not itself designated as an EOC or community gathering place, it is located within the broader emergency planning framework for the City and County, including evacuation routes in the surrounding Boyle Heights/Lincoln Heights area. I-5 and I-10 are designated Freeway Disaster Routes under the Los Angeles County General Plan Safety Element. Mission Road, Valley Boulevard, and Soto Street are designated Highway Disaster Routes (County of Los Angeles 2025). Mission Road runs adjacent to the Project Site and provides direct access to these regional routes. Operation of the Proposed Project would not involve permanent roadway closures, reduction in roadway capacity, or alterations to designated disaster routes. Although project operation may incrementally increase traffic volumes, access to and through these designated disaster routes would be maintained, and no physical changes to these facilities are proposed. The new helipad would enhance the Project Site's emergency response capabilities by providing upgraded facilities for medical air transport and emergency evacuation. The helipad would be designed consistent with FAA Advisory Circular 150/5390-2C (Heliport Design) and LAFD operational requirements, ensuring continued safe access for emergency responders (FAA 2024; LAFD

2025). As discussed in the Operations discussion in Chapter 3.15, *Transportation*, although buildout of the Proposed Project could increase traffic congestion in the vicinity, no significant impacts during Proposed Project operation would be expected because the Proposed Project would allow for adequate access through and to the Project Site. The Proposed Project would be designed and operated to maintain sufficient emergency ingress and egress for fire and medical services, and no substantial impediments to emergency response or evacuation would occur. The Proposed Project also includes a new on-site elementary school; however, because that facility would be designed and constructed in accordance with applicable fire, building, and emergency access standards and integrated into the overall Campus emergency response and evacuation framework, it would not be exposed to significant cumulative emergency access or evacuation impacts. No mitigation measures would be required during Project operation, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction and Operation

The Project Site is in a fully urbanized portion of the City of Los Angeles and is surrounded by developed land uses, including major roadways, residential neighborhoods, and institutional facilities. The Project Site is not in a State of California Very High Fire Hazard Severity Zone (FHSZ) or in an area designated by LACFD as subject to wildland fire risk (CALFIRE 2024). Although the Project Site itself is not located within a very high FHSZ, it is within one mile of a designated very high FHSZ in a Local Responsibility Area. As discussed further in Chapter 3.18, *Wildfire*, the intervening urbanized development eliminates direct wildfire risk to the Project Site. In addition, redevelopment of the on-site emergency helipad would provide a beneficial feature by enhancing aerial emergency response capacity and improving regional access for firefighting and medical evacuation during wildfire or other disaster events (FAA 2024; LAFD 2025). Therefore, there would be **no impact** and no mitigation is required.

Significance without Mitigation: No impact. No mitigation is necessary.

3.8.5 Cumulative Impact Analysis

The study area for potential cumulative hazards and hazardous materials impacts consists of the Project Site and a one-mile radius encompassing the related projects identified in Chapter 3, Environmental Analysis, of this Draft SEIR, 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative

Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). The geographic extent is appropriate because potential cumulative hazards impacts associated with the Proposed Project would be localized in nature and limited to demolition, grading, subsurface disturbance, routine hazardous materials use, and regulatory oversight of contaminated sites. The Project Site and surrounding area are characterized by highly urbanized land uses with a long history of institutional, commercial, and residential development, and hazardous materials conditions in the area are typically associated with legacy USTs, fuel storage, former industrial operations, and routine urban redevelopment activities. Accordingly, a one-mile radius provides a meaningful area within which reasonably foreseeable projects could contribute to cumulative hazardous materials handling, disturbance of contaminated soils, vapor encroachment conditions, or regulatory listings.

The 2014 Master Plan EIR identified cumulative development within surrounding neighborhoods; however, for purposes of this Draft SEIR, a one-mile radius has been identified as the appropriate cumulative study area based on the localized nature of potential hazards impacts and the urbanized setting of the Project Site.

Would the project have a cumulative effect related to hazards and hazardous materials?

Routine Transport, Use, and Disposal of Hazardous Materials

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased the potential for exposure to hazardous materials during construction or operation, including through demolition of buildings containing hazardous materials, disturbance of contaminated soils, or the routine transport, use, and disposal of hazardous substances.

The study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Cumulative projects within the study area would involve demolition, grading, and operation of facilities that require handling and disposal of hazardous materials. Cumulative projects would be subject to regulatory rules and regulations, such as South Coast AQMD Rule 1403 (asbestos), CDPH standards (lead), RWQCB and DTSC oversight for soil and groundwater remediation, and the City of Los Angeles Methane Ordinance. The Proposed Project would add considerably to these cumulative conditions through its demolition of structures with ACM and LBP; grading in areas with petroleum

hydrocarbons, methane, and an idle oil well. Absent mitigation, this contribution would be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-8: Construction and operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during demolition and construction.

Mitigation: Implement Mitigation Measure HAZ-1a through HAZ-1d.

Significance with Mitigation: Less than significant. Accordingly, with implementation of Mitigation Measures HAZ-1a through HAZ-1d, which require hazardous materials abatement, contaminated soil management, confirmatory investigation, and proper evaluation of the abandoned oil well, and in compliance with applicable federal, State, and local regulations governing the handling, transport, and disposal of hazardous materials (e.g., South Coast AQMD Rule 1403, California Department of Public Health requirements, and Los Angeles Regional Water Quality Control Board oversight), the Proposed Project's contribution would not be cumulatively considerable. In addition, hazardous materials impacts during construction are generally site-specific and temporary, and cumulative development in the surrounding urbanized area would be subject to the same regulatory requirements and standard construction controls, thereby minimizing the potential for additive impacts. Therefore, cumulative impacts would be **less than significant.**

Operation

Cumulative operational impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased the routine transport, use, storage, or disposal of hazardous materials during long-term operation. Development within the study area includes institutional, commercial, and residential land uses that routinely store and use hazardous materials in compliance with applicable regulatory requirements.

Operational uses associated with cumulative development may include the storage and use of fuels, cleaning agents, laboratory chemicals, and other regulated materials. Facilities that store or handle hazardous materials are required to comply with federal, State, and local regulatory programs governing hazardous materials management. These regulatory programs require proper handling, storage, transport, and disposal of hazardous materials and waste to minimize the risk of accidental release or exposure.

The Proposed Project would include long-term operation of medical and community-serving uses that store and handle hazardous materials. These materials would be stored, handled, and disposed of in accordance with applicable regulatory requirements and facility hazardous materials management plans. Routine operation of the Proposed Project would involve the

transport, use, and disposal of hazardous materials that could contribute to cumulative conditions in the region. Absent mitigation, this contribution could be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-9: Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during long-term operation.

Mitigation: Implement Mitigation Measure HAZ-2.

Significance with Mitigation: Less than significant. Accordingly, with implementation of Mitigation Measures HAZ-2, which requires preparation and implementation of a vapor intrusion mitigation plan and installation of appropriate engineering controls prior to occupancy, and in compliance with applicable federal, State, and local regulations governing hazardous materials and soil vapor (including oversight by the Los Angeles Regional Water Quality Control Board and adherence to City of Los Angeles Methane Zone requirements and CalEPA guidance), the Proposed Project's contribution would not be cumulatively considerable. Vapor intrusion risks are site-specific and addressed through structure-specific design and engineering controls, and similar projects in the surrounding urbanized area would be subject to the same regulatory requirements and performance standards. As a result, the potential for additive or combined exposure risks is low, and cumulative impacts would be **less than significant.**

Upset and Accident Conditions

Construction

Cumulative impacts related to upset and accident conditions would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects within the one-mile cumulative study area, substantially increased the risk of accidental release of hazardous materials during demolition, grading, excavation, or construction activities. Cumulative construction and demolition projects within the one-mile study area would involve handling and disturbance of hazardous building materials, contaminated soils and vapors, methane in subsurface conditions, and legacy infrastructure. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this study area is generally limited to infill redevelopment. Other cumulative projects are required to comply with federal, State, and local rules, regulations, and requirements, including South Coast AQMD Rule 1403 for asbestos, California Department of Public Health standards for lead-based paint, Los Angeles RWQCB oversight for soil and groundwater contamination, and City of Los Angeles Methane Zone regulations.

The Proposed Project would contribute to the cumulative risk of accidental release of hazardous materials during demolition, grading, and construction activities by demolishing and redeveloping structures known to contain asbestos and lead-based paint, excavating soils with petroleum hydrocarbons and VOCs, disturbing undocumented fill and methane-impacted soils, and intersecting an idle oil well. Absent mitigation, this contribution would be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-10: During construction, the Proposed Project, together with other past, present, and reasonably foreseeable development projects could result in reasonably foreseeable upset and accidental release of hazardous materials through hazardous materials handling, building demolition, and disturbance of contaminated soils and subsurface conditions.

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

Significance with Mitigation: Less than significant. With implementation of Mitigation Measures HAZ-1a through HAZ-1d, which require hazardous materials abatement, contaminated soil management, confirmatory investigation, and evaluation of the idle oil well prior to grading and HAZ-2, which requires preparation and implementation of a vapor intrusion mitigation plan and installation of appropriate engineering controls prior to occupancy, the Proposed Project's contribution to cumulative construction impacts would not be cumulatively considerable. In addition, compliance with applicable federal, State, and local regulations governing hazardous materials handling, transport, and disposal (e.g., South Coast AQMD Rule 1403, California Department of Public Health requirements, and Los Angeles Regional Water Quality Control Board oversight) would minimize the potential for accidental releases during construction. Upset conditions associated with hazardous materials are typically localized and temporary, and cumulative development in the surrounding urbanized area would be subject to the same regulatory requirements and standard construction practices, thereby reducing the likelihood of simultaneous or overlapping releases that could result in a cumulatively considerable impact. Cumulative construction impacts would be **less than significant**.

Operation

Cumulative operational impacts related to upset and accident conditions would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased the risk of accidental release of hazardous materials during routine operation of facilities. Development within the study area includes institutional, commercial, and residential uses that routinely store and handle hazardous materials such as fuels, cleaning agents, laboratory chemicals, and medical materials.

Facilities that store or handle hazardous materials must comply with applicable federal, State, and local regulatory requirements. These regulatory programs establish procedures for safe

storage, handling, transport, and disposal of hazardous materials to minimize the potential for accidental releases.

The Proposed Project would include long-term operation of medical and community-serving uses that store and handle hazardous materials. Because subsurface investigations have documented volatile organic compounds in soil vapor above screening levels, vapor intrusion could present a potential pathway for exposure if not properly addressed. Absent mitigation, this contribution could be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-11: During operation, the Proposed Project, together with other past, present, and reasonably foreseeable projects, could involve the continued use, storage, and handling of hazardous materials and could create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release conditions during operation absent mitigation.

Mitigation: Implement Mitigation Measure HAZ-2.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measure HAZ-2, which requires preparation and implementation of a vapor intrusion mitigation plan and installation of appropriate engineering controls prior to occupancy of buildings in affected areas, the Proposed Project's contribution to cumulative operational upset conditions would not be cumulatively considerable. Cumulative operational impacts would be **less than significant**.

Hazardous Emissions in Proximity to Schools

Construction

Cumulative impacts related to hazardous emissions in proximity to schools would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased emissions of hazardous dust, fibers, or contaminated soils near existing schools or other sensitive receptors. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this study area is generally limited to infill redevelopment. Existing sensitive receptors within one-quarter mile of the Project Site include Francisco Bravo Medical Magnet Senior High School and the East Los Angeles Occupational Center. In addition, a child development center currently operates on the Project Site and would remain operational during Proposed Project construction.

Cumulative construction in proximity to Francisco Bravo Medical Magnet Senior High School and East Los Angeles Occupational Center would result in cumulative impacts due to the potential for hazardous dust, fibers, and contaminated soil emissions. Other projects in the study area must also comply with hazardous building materials abatement requirements and dust control standards, which partially reduce cumulative risks. The Proposed Project would contribute to

cumulative hazardous emissions in proximity to schools during demolition, grading, and construction activities by disturbing asbestos-containing materials, lead-based paint, and contaminated soils in an urban setting near the existing child development center, Francisco Bravo Medical Magnet Senior High School and East Los Angeles Occupational Center. Absent mitigation, this contribution would be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-12: The Proposed Project would have the potential to result in significant impacts during construction related to hazardous emissions and handling of hazardous materials within one-quarter mile of existing schools.

Mitigation: Implement Mitigation Measure HAZ-1a through HAZ-1c.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measures HAZ-1a through HAZ-1c, which require hazardous materials abatement and contaminated soil management during demolition and grading, the Proposed Project's contribution to cumulative construction impacts would not be cumulatively considerable. Cumulative construction impacts would be **less than significant**.

Operation

Cumulative operational impacts related to hazardous emissions in proximity to schools would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, resulted in ongoing emissions of hazardous substances that could affect nearby educational facilities. Operation of cumulative development in the study area primarily involves institutional, commercial, and residential uses that are subject to hazardous materials handling regulations and air quality regulations governing emissions of hazardous substances.

Operation of the Proposed Project would include long-term operation of medical and community-serving uses that store and handle hazardous materials. These materials would be handled in accordance with applicable hazardous materials management regulations, hazardous materials business plan requirements, and facility safety protocols.

Although the on-site child development center and nearby schools would remain sensitive receptors during operation of the Proposed Project, operational activities associated with the Proposed Project would not result in emissions of hazardous materials that would affect these receptors. Hazardous materials associated with operation of the Proposed Project would be stored, handled, and disposed of in compliance with applicable regulatory requirements designed to prevent releases to the surrounding environment, including implementation of Hazardous Materials Business Plans, employee training and spill prevention procedures, secondary containment systems for hazardous materials storage, proper labeling and inventory tracking, and emergency response coordination with local agencies. These requirements include spill prevention and response procedures, notification protocols, and measures specifically

intended to prevent releases from reaching areas accessible to the public or nearby sensitive receptors. Medical and laboratory uses would also comply with applicable requirements for handling, storage, and disposal of hazardous and medical waste, including use of licensed transporters and permitted disposal facilities. Additional standard operational protocols include indoor storage of hazardous materials, routine inspection of storage areas, and use of sealed containers and controlled loading areas to prevent off-site migration of hazardous materials.

Therefore, the Proposed Project's contribution to cumulative operational impacts related to hazardous emissions in proximity to schools would not be cumulatively considerable, and cumulative operational impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Hazardous Materials Regulatory Listings

Construction

Cumulative impacts related would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increased the risk associated with redevelopment of sites identified on hazardous materials regulatory lists. Cumulative projects in the study area are located in an older, highly urbanized setting where past land uses commonly included underground storage tanks, fueling stations, and industrial operations. As a result, multiple sites in the cumulative study area are included on hazardous materials regulatory lists maintained pursuant to Government Code Section 65962.5. However, these sites are subject to investigation and remediation under federal and State regulatory programs. Cleanup and closure activities must comply with the RCRA, and applicable County hazardous waste and hazardous materials disclosure programs, which collectively govern the identification, containment, and remediation of contaminated sites.

The Proposed Project is itself located on a listed site with documented hazardous materials conditions, including active diesel USTs, a closed LUST case with residual contamination, VOCs in soil vapor, methane, undocumented fill, and an idle oil well. Absent mitigation, the Proposed Project's contribution to cumulative hazards associated with redevelopment of listed sites would be cumulatively considerable. Impacts would be potentially **significant**.

Impact HAZ-13: Construction activities for the Proposed Project, together with other past, present, and reasonably foreseeable projects, would be located on a site included on hazardous materials regulatory lists and could create a significant hazard to the public or environment during demolition, grading, and excavation absent mitigation.

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

Significance with Mitigation: Less than significant. With implementation of Mitigation Measures HAZ-1a through HAZ-1d, which require hazardous materials abatement, contaminated soil management, confirmatory investigation, and evaluation of the abandoned oil well prior to grading and HAZ-2, which requires preparation and implementation of a vapor intrusion mitigation plan and installation of appropriate engineering controls prior to occupancy, the Proposed Project's contribution to cumulative construction impacts would not be cumulatively considerable. Cumulative construction impacts would be **less than significant**.

Operation

Cumulative operational impacts related to redevelopment of sites identified on hazardous materials regulatory lists would occur if the Proposed Project, together with other past, present, and reasonably foreseeable development in the region, increased the potential for exposure to hazardous materials associated with long-term operation of facilities on sites with known or potential contamination. The cumulative study area is located in an older, highly urbanized portion of the City of Los Angeles where historic land uses commonly included fueling stations, underground storage tanks, and industrial operations. As a result, several sites in the study area are included on hazardous materials regulatory lists maintained pursuant to Government Code Section 65962.5.

Long-term operation of the Proposed Project would include continued use of active underground storage tank systems associated with emergency power generation and the Project Site would remain within a mapped Methane Zone. Routine monitoring, testing, and regulatory oversight would be required to ensure compliance with applicable SWRCB, LAFD, and City methane mitigation requirements. Operational activities would not involve disturbance of known contaminated soils, undocumented fill, or legacy infrastructure that could result in release of hazardous materials.

Because operation of the Proposed Project would occur under ongoing regulatory oversight and would not involve disturbance of contaminated soils or subsurface conditions, the Proposed Project would not substantially increase cumulative hazards associated with redevelopment of listed sites. Therefore, the Proposed Project's contribution to cumulative operational impacts related to hazardous materials regulatory listings would not be cumulatively considerable, and cumulative operational impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Airport-Related Safety Hazards and Noise

Construction

Cumulative impacts related to airport safety hazards and noise would occur if the Proposed Project, together with other past, present, and reasonably foreseeable development in the region, collectively exposed people or structures to airport-related safety risks or excessive aircraft noise. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in the study area is generally limited to infill redevelopment. Cumulative development within the study area is not located within two miles of a public airport, public use airport, or private airstrip. The nearest airports is LAX, approximately 12 miles southwest, and Hollywood Burbank Airport, approximately 12 miles northwest, are well beyond the cumulative study area. As such, cumulative projects would not collectively expose construction workers, residents, or employees to airport-related safety hazards or excessive noise. The Project Site is also located outside of any airport land use plan influence area and more than two miles from the nearest public airport. Accordingly, the Proposed Project contribution would not be cumulatively considerable, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Operational impacts related to airport hazards would occur if new development exposed residents, employees, or visitors to airport-related safety hazards or noise. The Project Site is located outside of any airport land use plan influence area and more than two miles from the nearest public airport. Operation of the replacement helipad would continue to be regulated under FAA and LAFD requirements for emergency medical heliports, ensuring that flight operations, lighting, and airspace clearances remain consistent with applicable safety standards.

Accordingly, operation of the Proposed Project would not expose people or structures to airport-related safety hazards or excessive aircraft noise, and the Proposed Project's contribution to cumulative operational impacts would not be cumulatively considerable. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Emergency Response and Evacuation Access

Construction

Cumulative impacts related to emergency response and evacuation access would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the

region, substantially impaired implementation of adopted emergency response or evacuation plans through roadway closures, congestion, or physical interference with designated routes. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in the study area is generally limited to infill redevelopment. Cumulative construction across the study area could contribute to temporary traffic congestion, lane closures, and detours that impair emergency response access. Emergency response and evacuation planning in the study area is managed under the City of Los Angeles EOP and the Los Angeles County Operational Area Emergency Response Plan, which establish coordination procedures among local agencies, law enforcement, fire departments, and public works during construction and emergency events. Additionally, roadway activities and temporary closures are regulated under Los Angeles Municipal Code Chapter 62, which requires Traffic Management Plans and coordination with the Los Angeles Department of Transportation and the LAFD to maintain emergency access. Implementation of the Proposed Project would involve construction traffic and temporary roadway disruptions typical of urban redevelopment projects. Absent mitigation, the Proposed Project's contribution to cumulative hazards associated with emergency response and evacuation access would be cumulatively considerable. Impacts would be potentially **significant**.

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

Mitigation: Implement Mitigation Measures TRAF-1 and TRAF-4.

Significance with Mitigation: Less than significant. With implementation of Mitigation Measures TRAF-1 and TRAF-4, which require coordination with emergency service providers and preparation of construction traffic management plans to maintain emergency access routes, the Proposed Project's contribution to cumulative construction impacts would not be cumulatively considerable. Cumulative construction impacts would be **less than significant**.

Operation

Operational impacts related to emergency response and evacuation access would occur if new development substantially interfered with emergency response routes or evacuation procedures. Operation of the Proposed Project would introduce additional residents, employees, and visitors to the area but would not alter existing emergency response routes or evacuation plans.

Because the Proposed Project would operate within the existing roadway network and emergency response framework and would not physically obstruct emergency access routes, the Proposed Project's contribution to cumulative operational impacts would not be cumulatively considerable. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Wildland Fire Risk

Construction

Cumulative construction impacts related to wildland fire risk would occur if the Proposed Project, together with other past, present, and reasonably foreseeable development in the region, substantially increased exposure of people or structures to wildland fire hazards or impaired emergency evacuation in areas subject to wildfire risk. As discussed in Section 3.18, *Wildfire*, nearby cumulative projects located in or near very high FHSZs and State Responsibility Areas (SRAs) would be subject to California Building Code (CBC) and California Fire Code standards, CAL FIRE defensible space regulations, and review by local fire departments to minimize wildfire risks. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. The Project Site is not in a very high FHSZ or the wildland-urban interface but is within one mile of a very high FHSZ in a Local Responsibility Area. Because the Project Site is fully urbanized and separated from natural fuel sources by intervening development, implementation of the Proposed Project would not increase exposure to wildland fire hazards or impair evacuation in areas designated as very high FHSZs.

Accordingly, the Proposed Project's contribution would not be cumulatively considerable, and **no cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Operational wildfire impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable development in the region, substantially increased exposure of people or structures to wildfire hazards or impaired evacuation in areas subject to wildfire risk. The Project Site is not located within a very high FHSZs and SRA and is separated from nearby natural fuel sources by intervening urban development.

Accordingly, operation of the Proposed Project would not increase wildfire risk or impair evacuation in wildfire-prone areas. The Proposed Project's contribution to cumulative wildfire impacts would not be cumulatively considerable. **No cumulative impacts** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

3.8.6 Comparison to the 2014 Master Plan EIR Impact Analysis

Impacts related to hazards and hazardous materials in both the 2014 Master Plan EIR, as shown in Table 3.8-2, *Summary of the 2014 Master Plan Hazards and Hazardous Materials Impact Conclusions*, and this Draft SEIR resulted in similar impact conclusions because the overall amount of ground-disturbing activity provided by both projects is similar. While overall land use development densities are higher for the Proposed Project than the 2014 Master Plan, both projects assumed ground-disturbing activities across the entire Project Site, resulting in similar physical impacts. While the inclusion of the adaptive reuse and related work within the General Hospital Building is a new component of the Proposed Project compared to the 2014 Master Plan EIR, the activities involved (construction, selective demolition, etc.) are the same as those proposed for other buildings on the Project Site, and the mitigation measures as proposed herein would sufficiently reduce impacts. Overall, hazards conditions are the same for both projects given the Project Site is the same.

As described in Section 3.8.4, *Project Impact Analysis*, and Section 3.8.5, *Cumulative Impact Analysis*, the Proposed Project would result in several potentially significant impacts related to hazardous building materials, USTs and associated subsurface contamination, routine hazardous materials handling during construction, potential accidental release of hazardous substances, hazardous emissions in proximity to schools, and emergency response and evacuation access. In the 2014 Master Plan EIR, three mitigation measures were identified to address hazardous materials impacts (asbestos and lead abatement, investigation of the leaking UST site at 1200 North State Street, and subsurface investigations of other USTs and powerhouse areas). These measures reduced impacts to less-than-significant levels (County of Los Angeles 2014).

The 2014 Master Plan EIR evaluated potential construction-related exposure of nearby sensitive receptors and hazardous emissions in proximity to schools, including Francisco Bravo Medical Magnet Senior High School and East Los Angeles Occupational Center, and concluded that impacts would be reduced to less than significant with implementation of mitigation requiring hazardous building materials abatement and compliance with regulatory standards governing soil disturbance and emissions control. This Draft SEIR similarly evaluates potential exposure to these off-site schools, as well as phased construction scenarios in which the proposed on-site elementary school could become operational during later construction activities. Consistent with the 2014 analysis, this Draft SEIR concludes that implementation of updated mitigation measures and compliance with applicable regulatory requirements would reduce impacts to less than significant levels.

In this Draft SEIR, those core measures have been reevaluated based on updated technical studies. Mitigation Measure HAZ-2 from the 2014 Master Plan EIR addressed the LUST site at 1200 North State Street. Although this case received regulatory closure in 2021, the 2023 Phase I ESA concluded that it remains a REC due to residual petroleum hydrocarbons in groundwater above applicable standards and the potential for vapor encroachment.

Accordingly, Mitigation Measure HAZ-2 has been retained and renumbered as Mitigation Measure Haz-1b to require further evaluation and management of this REC during redevelopment activities. In addition to this updated mitigation measure, five new mitigation measures, Mitigation Measure HAZ-1a and Mitigation Measures HAZ-1c, HAZ-1d and HAZ-2, have been added to address conditions identified in the 2023 Phase I ESA, 2025 subsurface investigations, and methane surveys. These measures include asbestos and lead abatement, evaluation and management of residual contamination at 1200 North State Street, additional Phase II investigations of USTs and powerhouse areas, preparation of a vapor intrusion mitigation plan for VOCs in soil vapor, evaluation and potential of the idle oil well to be properly plugged and sealed, and implementation of the SMP prepared for the Proposed Project to guide handling, testing, disposal of contaminated or potentially contaminated soils. The SMP and associated mitigation measures are intended to protect construction workers, on-site occupants, visitors, nearby residents, and adjacent sensitive receptors by requiring appropriate soil handling procedures, emissions controls, and regulatory oversight during grading and excavation.

The Proposed Project also includes a new on-site elementary school; however, because that facility is part of the Proposed Project, it is not treated as an off-site sensitive receptor under the school proximity threshold. These additions reflect new information not available at the time of the 2014 Master Plan EIR (County of Los Angeles 2014).

With the implementation of Mitigation Measures HAZ-1a through HAZ-1d and Mitigation Measure HAZ-2 for hazardous materials management, and Mitigation Measures TRAF-1 and TRAF-4 for emergency access and evacuation, each of the Proposed Project's potentially significant impacts would be reduced to a less-than-significant level. Consistent with the findings from the 2014 Master Plan EIR, this Draft SEIR concludes that no significant and unavoidable impacts related to hazards and hazardous materials would result from implementation of the Proposed Project. Appendix B to this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.9 HYDROLOGY AND WATER QUALITY

This chapter of the Draft SEIR discusses the Project Site's hydrologic setting; evaluates the potential impacts related to hydrology and water quality from the implementation of the Proposed Project; and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts associated with hydrology and water quality.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, no comments were received regarding hydrology and water quality impacts. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included in Appendix A, *Notice of Preparation and Scoping Comments*, of this document, and are presented in Table 1-1, *Summary of Scoping Comments Received*.

Preparation of this analysis was informed in part by the following assessment:

- *Water Supply Assessment for the Los Angeles County General Hospital Campus Community Plan.* Los Angeles Department Water and Power, Water Resources Division. December 31, 2025. (Appendix H of this Draft SEIR)

3.9.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Clean Water Act

The Clean Water Act (CWA) is the primary federal law that protects the quality of the nation's surface waters, including lakes, rivers, and coastal wetlands. It is based on the principle that all discharges into the nation's waters are unlawful unless specifically authorized by a permit. Permit review is the CWA's primary regulatory tool. The CWA requires states to adopt water quality standards for receiving waters. Water quality standards designate beneficial uses for receiving waters and include the criteria required to support such uses. Water quality criteria are either narrative statements related to the quality of the water that support a particular use

or maximum concentration levels for pollutants (i.e., bacteria, etc.). As part of the CWA, when monitoring data indicate that a concentration level for a pollutant has been exceeded, the receiving water is classified as *impaired* and placed on the CWA Section 303(d) List of Water Quality–Limited Segments Requiring Total Maximum Daily Loads (TMDLs) (303[d] list). A TMDL is then developed for the pollutant(s) that caused the impairment. The purpose of the TMDL is to limit the volume of pollutants discharged into the receiving water from all sources (i.e., stormwater runoff, wastewater, agriculture) (EPA 2025).

National Pollutant Discharge Elimination System General Construction Permit

The National Pollutant Discharge Elimination System (NPDES) was established per 1972 amendments to the Clean Water Act to control discharges of pollutants from point sources (Section 402) (EPA 2025). The 1987 amendments to the CWA created a section devoted to stormwater permitting (Section 402[p]), with individual states designated for administration and enforcement of the provisions of the CWA and the NPDES permit program. The State Water Resources Control Board (SWRCB) issues Construction General Permits under this program. Projects that will disturb more than one acre of land during construction are required to file a Notice of Intent (NOI) with the SWRCB to be covered under the NPDES Construction General Permit for discharges of stormwater associated with construction activity. The project proponent must develop measures that are consistent with the Construction General Permit. Furthermore, a Stormwater Pollution Prevention Plan (SWPPP) must be developed and implemented for each site covered under the Construction General Permit. The SWPPP describes the best management practices (BMP) the discharger will use to protect stormwater runoff and reduce potential impacts on surface water quality through the construction period. The SWPPP must contain:

- A visual monitoring program.
- A chemical monitoring program for nonvisible pollutants (to be implemented in case of a BMP failure).
- A sediment monitoring plan if the site discharges directly to a water body on the 303(d) list for sediment.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which provides subsidized access to federally-backed flood insurance for property owners and renters in communities that comply with FEMA regulations (Title 44 Code of Federal Regulations, Parts 59, 60 and 65) that regulate development in floodplains in moderate to severe flood hazard areas. FEMA also issues Flood Insurance Rate Maps that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection established by FEMA is the

100-year flood event, also described as a flood that has a 1 in 100 chance of occurring in any given year (FEMA 2025).

Federal Executive Order 11988

Executive Order 11988, signed by President Jimmy Carter on May 24, 1977, governs all actions undertaken by federal agencies, including construction, funding, and regulatory activities. Executive Order 11988 directs federal agencies to:

- Assert leadership in reducing flood losses;
- Avoid actions located in or adversely affecting floodplains unless there is no practicable alternative;
- Take action to mitigate losses if avoidance is not practicable; and
- Establishes a process for flood hazard evaluation based upon the 100-year base flood standard of the National Flood Insurance Program.

Executive Order 11988 states that, at a minimum, federal agencies must comply with National Flood Insurance Program regulations.

STATE

Porter-Cologne Water Quality Control Act of 1969

The Porter-Cologne Water Quality Control Act (Porter-Cologne or the Act) established the SWRCB and divided the State into nine regional basins, each with a Regional Water Quality Control Board (RWQCB) that oversees water quality in that basin (CRB 2018). The SWRCB is the primary State agency with responsibility for protecting the quality of the state's surface water and groundwater.

The Act authorizes the SWRCB to draft policies regarding water quality in accordance with CWA Section 303. In addition, the Act authorizes the SWRCB to issue waste discharge requirements (WDRs) for projects that would discharge to State waters. The Act requires the SWRCB or the RWQCB to adopt water quality control plans, otherwise referred to as basin plans, for the protection of water quality (NCRWB 2025). A basin plan must:

- Identify beneficial uses for the water to be protected.
- Establish water quality objectives for the reasonable protection of the beneficial uses.
- Establish an implementation program for achieving the water quality objectives.

Basin plans also provide the technical basis for determining WDRs, taking enforcement actions, and evaluating clean water grant proposals. Basin plans are updated and reviewed every three years in accordance with Article 3 of the Porter-Cologne Act and CWA Section 303(c) (NCRWB 2025).

Sustainable Groundwater Management Act of 2014

On September 16, 2014, a three-bill legislative package was signed into law, collectively known as the Sustainable Groundwater Management Act (SGMA). The governor's signing message states, "a central feature of these bills is the recognition that groundwater management in California is best accomplished locally." Under the roadmap laid out by the legislation, local and regional authorities in medium- and high-priority groundwater basins must form groundwater sustainability agencies that oversee the preparation and implementation of groundwater sustainability plans (CDWR 2025).

State Water Resources Control Board

In California, the SWRCB has broad authority over water quality control issues for the State. It is responsible for developing statewide water quality policy and exercises the powers delegated to the State by the federal government under the CWA. It also regulates public drinking water systems, NPDES wastewater discharges, water quality monitoring, water recycling programs, landfill disposal, water rights, and implements drought restrictions. The Project Site is within the jurisdiction of the Los Angeles RWQCB (Region 4), which regulates surface water and groundwater quality in the watershed that encompasses Los Angeles and Ventura Counties and small portions of Kern and Santa Barbara Counties (EPA 2025b).

SWRCB General Construction Permit

Construction activities disturbing one or more acres of land that could impact hydrologic resources must comply with the requirements of the current SWRCB Construction General Permit (CGP) (Order WQ 2022-0057-DWQ) (SWRCB 2025a). Under the terms of the permit, applicants must file Permit Registration Documents (PRD) with the SWRCB prior to the start of construction. The PRDs include an NOI, risk assessment, site map, SWPPP, annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System website.

Applicants must also demonstrate conformance with applicable BMPs and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project Site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a sampling program to ensure compliance with water quality standards, and on-site collection of samples and inspection of BMPs during a qualifying precipitation event.

SWRCB Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to control trash and Part 1, Trash Provisions, of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SWRCB 2025b). They are collectively referred to as the "Trash Amendments." The Trash Amendments apply to all surface waters of California and include a land-use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high density residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses. There are two compliance tracks for Phase I Municipal Separate Storm Sewer System (MS4) permittees[1]:

- **Track 1:** Permittees must install, operate, and maintain a network of certified full capture systems in storm drains that capture runoff from priority land uses.
- **Track 2:** Permittees must implement a plan with a combination of full capture systems, multi-benefit projects, institutional controls, and/or other treatment methods that have the same effectiveness as Track 1 methods.

The Trash Amendments provide a framework for permittees to implement their provisions. Full compliance must occur within 10 years of the permit, and permittees must also meet interim milestones such as average load reductions of 10 percent per year. The amendment mandates that the City install filters on all City catch basins by December 2, 2030 (SWRCB 2023).

Executive Order B37-77

Executive Order B37-77, signed by Governor Jerry Brown on November 26, 1977, governs actions undertaken by State agencies, including construction, funding and regulatory activities. Executive Order B37-77 directs State agencies to, in coordination with the California Department of Water Resources, provide leadership in efforts to minimize the risk of flood losses in connection with state lands and installations and state financed, insured, or assisted improvements, including:

- Evaluating flood hazards when planning the location of new State facilities, and construct and maintain State facilities in accordance with National Flood Insurance Program standards or standards set by the Department of Water Resources based on best available information.

[1] Phase I MS4 permittees are operators of Municipal Separate Storm Sewer Systems (MS4s) in cities or counties with populations of 100,000 or more. An MS4 is a publicly owned, regulated network of structures, including curbs, gutters, storm drains, and ditches, designed to collect and convey untreated stormwater runoff directly into local water bodies. It is "separate" because it does not combine with sanitary sewer.

- Reconstructing, rehabilitating, or adding to existing publicly-used State structures in flood hazard areas in accordance with National Flood Insurance Program standards.
- In the administration of any form of direct or indirect state assistance involving construction or acquisition, assuring that the evaluation and mitigation of flood hazards in connection with such facilities is in accordance with National Flood Insurance Program standards or standards set by the Department of Water Resources based on best available information.
- In actions that affect land use planning, including permitting activities, taking flood hazards into account in accordance with recognized floodway and 100-year frequency flood design standards.

REGIONAL

Water Quality Control Plan, Los Angeles Region

The Los Angeles RWQCB, which has jurisdiction over the Project Site, addresses regionwide water quality issues through the creation and triennial update of the Los Angeles Region Basin Plan (Basin Plan) (LARWQCB 2025b). The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (1) designates beneficial uses for surface and ground waters, (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and (3) describes implementation programs to protect all waters in the region. In addition, the Basin Plan incorporates (by reference) all applicable SWRCB and RWQCB plans and policies and other pertinent water quality policies and regulations.

MS4 Permit for the Coastal Watershed

On July 23, 2021, the Los Angeles RWQCB adopted a Regional Phase I MS4 Permit for discharges within the coastal watersheds of Los Angeles and Ventura Counties (Order No. R4-2012-0175, as amended by State Water Board Order WQ 2015-0075 and Los Angeles Water Board Order R4-2012-0175-A01, NPDES No. CAS004001). The permit establishes performance criteria for new development and redevelopment projects in the Coastal Zone, including low-impact development (LID)[2]. The permit also requires each regulated entity, including the County of Los Angeles, to participate in regional watershed working groups to identify regional projects to improve water quality in the local receiving waters (LARWQCB 2012).

Entities subject to waste discharge requirements for MS4 discharges originating from within their jurisdiction are: the Los Angeles County Flood Control District (LACFCD) and County of Los

[2] LID is a stormwater management and land development strategy that combines a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality.

Angeles; 85 incorporated cities within the coastal watersheds of Los Angeles County; Ventura County Watershed Protection District; County of Ventura; and 10 incorporated cities in Ventura County (LARWQCB 2012).

Groundwater from Construction and Project Dewatering to Surface Waters

On June 6, 2013, the Los Angeles RWQCB adopted Order No. R4-2023-0429—Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. The order covers discharges to surface waters from dewatering operations and other types of wastewaters, as deemed appropriate, and authorizes discharges of treated or untreated groundwater generated from dewatering operations, or other applicable wastewater discharges not specifically covered, or fill materials that have received water quality certification pursuant to Section 401 of the CWA (LARWQCB 2024).

To be authorized to discharge, the discharger must submit a notice of intent. If the discharge is eligible, the Los Angeles RQWCB will notify the discharger that the discharge is authorized and prescribes an appropriate monitoring and reporting program. For new discharges, the discharge shall not commence until receipt of the Los Angeles RWQCB's written determination of eligibility or until an individual NPDES permit is issued (LARWQCB 2023).

Standard Urban Stormwater Mitigation Plan

The NPDES MS4 Permit defines the minimum required BMPs that must be adopted by the permittee municipalities and included by developers in plans for facility operations (LARWQCB 2012). To obtain coverage under this permit, a developer must obtain approval of a project-specific Standard Urban Stormwater Mitigation Plan (SUSMP) from the appropriate permittee municipality. A SUSMP addresses the discharge of pollutants in stormwater after new construction or redevelopment. Under recent regulations adopted by the Los Angeles RWQCB, projects are required to implement a SUSMP during the operational life of a project to ensure that stormwater quantity and quality is addressed by incorporating BMPs into project design. The SUSMP defines water quality design standards to ensure that stormwater runoff is managed for water quality concerns and to ensure that pollutants carried by stormwater are confined and not delivered to receiving waters. Applicants are required to abide by source-control and treatment-control BMPs from the list approved by the Los Angeles RWQCB and included in the SUSMP. These measures include infiltration of stormwater as well as filtering runoff before it leaves a site. This can be accomplished through various means, including the use of infiltration pits, flow-through planter boxes, hydrodynamic separators, and catch basin filters.

In combination, these treatment control BMPs must be sufficiently designed and constructed to treat or filter the first 0.75 inch of stormwater runoff from a 24-hour storm event, or the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater (LARWQCB 2012). Permittees are required to

adopt the requirements in their own SUSMP. Additional BMPs as adopted by the permittee may be required by ordinance or code and applied in a general way to all projects or on a case-by-case basis.

LOCAL

County of Los Angeles Code of Ordinances

The County of Los Angeles Code of Ordinances establishes regulations and standards to protect water quality. The Code of Ordinances establishes the following specific regulations governing water quality.

- **Title 12, Chapter 12.84, Low Impact Development Standards:** Lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters and other water bodies. Minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies. Minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies.
- **Title 20, Chapter 21, Stormwater And Runoff Pollution Control:** The purpose and intent of this chapter is to regulate stormwater and non-stormwater discharges to the facilities of Los Angeles County Flood Control District for the protection of those facilities, the water quality of the waters in and downstream of those facilities, and the quality of the water that is being stored in water-bearing zones underground.
- **Title 20, Section 20.09.010, Maintaining Existing Water-Efficient Landscapes**: All existing landscaped areas within the county in which water is provided to irrigate, including golf courses, greenbelts, common areas, multifamily housing, schools, businesses, cemeteries, parks, and publicly owned landscapes are encouraged to have a landscape irrigation audit at least every five years.

- **Title 20, Section 20.94.040, Placing obstructions, refuse and contaminating substances in channels prohibited:** Prohibits the placement in floodplains anything that may impede, retard, or change the normal direction of the flow of the flood, storm, and other waters in the floodplain, or that may catch or collect debris carried by such waters, or that may be carried downstream by such waters to the damage and detriment of either private or public property within or adjacent to the floodplain, nor shall any material, either solid or liquid, be placed in the floodplain that will deteriorate the quality of water flowing or stored in the floodplain or that which is stored within the water-bearing zones underground.

County of Los Angeles General Plan

The Los Angeles County General Plan 2035 (LA County General Plan 2035) includes goals and policies to ensure development is designed and constructed in accordance with the applicable building codes and engineering requirements that address hydrology and water quality, as discussed below. As a County-run facility operated on County-owned land, the County has elected to demonstrate consistency with the applicable elements of the LA County General Plan 2035 for the Proposed Project.

The Conservation and Natural Resources Element of the LA County General Plan 2035 (County of Los Angeles 2025) guides the long-term conservation of natural resources and preservation of available open space areas. The following policies from the Conservation and Natural Resources Element are relevant to the Proposed Project:

- **Policy C/NR 6.1.** Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.
- **Policy C/NR 6.5.** Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.
- **Policy C/NR 7.4.** Promote the development of multi-use regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining non-stormwater runoff, and other compatible uses

County of Los Angeles 2025 Plumbing Code

The California Plumbing Code (CPC) sets minimum standards for plumbing system design, materials, installation, water supply, drainage, fixtures, etc., to protect health, safety, and welfare.

The 2025 County of Los Angeles Plumbing Code is based on the CPC 2025 with amendments and additions.

County of Los Angeles Erosion and Sediment Control Plan

In compliance with the County of Los Angeles NPDES MS4 Permit, Title 12.80, Environmental Protection Code; Title 26, Building Code (LACBC); and Title 31, Green Building Standards Code, all construction sites are required to implement BMPs to control erosion, debris, and construction-related pollutants.

Erosion and sediment control plans (ESCP) are year-round BMP measures that must be incorporated into construction plans. All grading projects, non-residential sites, residential sites of six stories or greater, and projects disturbing greater than one acre require an ESCP (County of Los Angeles 2017).

- The ESCP must include appropriate BMPs for General Site Management, Construction Materials and Waste Management, and Erosion and Sediment Controls. Erosion and Sediment Control BMPs must be provided for wet and dry seasons.
- To control site erosion and sediments, an ESCP must be submitted (or revised) every year to reflect site conditions at the start of the rainy season (October 15). Grading and building plans that will have construction work during the rainy season will not be approved until ESCPs are submitted and approved.
- For sites where the disturbed area is one acre or more, applicants must file an NOI and a SWPPP with the SWRCB Division of Water Quality, and obtain a Waste Discharge Identification number (County of Los Angeles 2017).

County of Los Angeles Flood Control District Permits

LACFCD administers permits for any work, encroachment, or activity within or affecting its right-of-way, facilities, interests, or jurisdiction. These include access permits for temporary uses of the LACFCD rights-of-way, construction permits for encroachment onto/or alteration of LACFCD right-of-way for new construction, connection permits for proposed connections to an existing LACFCD facility, and temporary discharge permits for the discharge of non-storm water into LACFCD facilities (LACFCD 2025).

County of Los Angeles Department of Public Works' Construction Site Best Management Practices Manual

The County of Los Angeles Department of Public Works (LACDPW) prepared its Construction Site Best Management Practices Manual (BMP manual) to assist contractors in the process of selection and implementation of construction site BMPs. The BMP manual includes the LACDPW requirements for the implementation of construction site BMPs. As site conditions change or as deemed necessary, LACDPW may impose additional construction site BMPs for contractor activities. Additional BMPs may be included in the project's contract special provisions or may be required by the LACDPW Engineer.

The BMP manual does not permit dewatering activities to discharge to the sanitary sewer system, street/gutter, ground, or any other location, whether contaminated, treated, or not, until approved by the LACDPW Engineer. A construction dewatering plan, in accordance with contract special provisions and NPDES permit issued by the RWQCB, must be submitted to the Engineer for approval prior to any dewatering discharge (LACDPW 2010).

Los Angeles County Low Impact Development Standards Manual

The County of Los Angeles prepared the 2025 Low Impact Development Standards Manual (LID Standards Manual) to comply with the requirements of the NPDES MS4 Permit (LACDPW 2025). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects with the intention of

improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

The LID Standards Manual defines "Non Designated Projects" and "Designated Projects," and their stormwater management requirements are outlined.

County of Los Angeles 2025 Building Code

Title 26, Section 110.1: Buildings (including walls and fences) are not permitted in an area determined by the County Building Official to be subject to flood hazard by reason of inundation, overflow or erosion, unless provision is made to eliminate such hazard to the satisfaction of the Building Official.

Title 26, Appendix J: Grading, excavation and earthwork construction, including fills and embankments, shall not be permitted in floodplains unless the applicant demonstrates through hydrology and hydraulic analysis, that he proposed work will not result in any increase in the level of the design flood.

City of Los Angeles Municipal Code

- **Chapter IX, Article 4, Plumbing Code.** The purpose of this Code is to safeguard health, life, property and public welfare by regulating the design, alteration, construction, installation, repair, and quality of materials for plumbing, fire sprinkler, rainwater piping, standpipe, subsurface drainage piping, swimming pool piping, reclaimed water piping, underground fire-protection piping, and graywater piping systems installed in the City. The plumbing code makes requirements for reducing indoor water consumption, including maximum flow rates for indoor water fixtures, and water efficiency requirements for renovation, redevelopment, and new development.
- **Chapter XII, Article V, Water Efficiency Requirements for New Development and Renovation of Existing Buildings.** This Article imposes water efficiency requirements for new buildings and for new plumbing fixtures in existing buildings to minimize the effect of any water shortages to the customers of the City.

3.9.2 Existing Conditions

REGIONAL DRAINAGE

The Campus is at the toe of a series of hills that shed water to the Los Angeles River and is in the Los Angeles River Watershed (County of Los Angeles 2025). The Los Angeles River is 51 miles long and is one of the largest watersheds in the region at 824 square miles. It is also one of the most diverse watersheds in terms of land use patterns. Approximately 324 square miles of the watershed are covered by forest or open space land, including the area near the headwaters

that originate in the Santa Monica, Santa Susana, and San Gabriel Mountains. The rest of the watershed is highly developed (LARWQCB 2025a).

LOCAL DRAINAGE

The Campus' historical context includes a former surface creek that ran north to south through the lower part of the Campus and provided a natural flood pathway for the upper watershed. The historic creek was near Coroner Road on the Campus and exited the site near the existing County of Los Angeles Medical Examiner building. The historic creek is now a buried stormwater pipe aligning with the on-site utility easement.

Approximately 20 percent of the slopes on the Campus exceed 10 percent; elevations in the Campus range from approximately 320 feet in the southwest to 450 feet in the northeast. Overland flow within the Project Site is generally from the northeast to the southwest. The flow of on-site runoff is driven by the natural site topography, and the majority of runoff flows toward the historic creek and drains into the existing storm drain that is maintained by the LACFCD. Flows from off-site into or through the Campus are minimal (County of Los Angeles 2014).

Slopes near the intersection of North Mission Road and Zonal Avenue are essentially flat, with elevations of approximately 330 feet, and overland flow is generally directed toward adjacent roadways.

STORM DRAIN SYSTEM

Both the City of Los Angeles and County of Los Angeles provide storm drainage collection services to the Project Site. Available record information indicates the presence of public storm drain facilities along the northern and southern project frontages. A 36-inch storm drain, maintained by the City, transitions in Zonal Avenue to a 4.5-foot by 4-foot reinforced concrete box bisecting the site from north to south. An abandoned LACFCD storm drain of unknown size and material is west of the reinforced concrete box. A 36-inch storm drain in Marengo Street is maintained by LACFCD and continues south of the Campus.

Currently, the Campus does not provide stormwater quality treatment measures, nor does it meet current the County's LID requirements. Stormwater detention or other flood control features have not been observed on-site. Instead, rainfall and stormwater runoff are managed with vertical roof drains, catch basins, drain inlets, underground reinforced concrete pipes, curbs, gutters, overland sheet flows, driveways, or other means of conveyance to the storm drain system. Much of the site runoff from hard- and softscapes is conveyed overland to the nearest drain inlet and conveyed via on-site pipe networks to stormwater mains in the surrounding streets.

SURFACE WATER QUALITY

The Campus is in Reach 2 of the Los Angeles River (LAGRIRWMA 2014), which is listed as a Category 5 water body on the 303(d) list. A Category 5 water body is defined as "a water segment where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants listed" (SWRCB 2024a). The listed pollutants for Reach 2 of the Los Angeles River are indicator bacteria, oil, oil and grease, ammonia, copper, lead, nutrients (algae), trash, and zinc (SWRCB 2024b).

In the 2014 EIR, certain nutrients were identified as pollutants of concern—algae, ammonia, Kjeldahl nitrogen, total nitrogen, and total phosphorous.

GROUNDWATER

The Project Site is within the City of Los Angeles Department of Water and Power's (LADWP) service area. LADWP provides water to the City and obtains water from the Los Angeles Aqueduct, local groundwater, recycled water, and imported supplemental water purchased from the Metropolitan Water District of Southern California. Several sources of local groundwater are accessible to the City. The San Fernando Basin (SFB) and Sylmar Basin, is the principal groundwater resource and where the City recharges and extracts local groundwater. The City also owns rights to and extracts groundwater from the Central Basin and is entitled to extract water from the neighboring West Coast Basin.

The Central Basin and West Coast Basin are in southern County of Los Angeles and provide approximately 40 percent of the overall water supply for the nearly four million residents and businesses in the 43 cities overlying the basins. The Central Basin covers approximately 280 square miles and is hydro-geologically divided into four subareas—the Los Angeles Forebay, Montebello Forebay, Whittier Area, and Pressure Area (LARWQCB 2014). The Campus is on the northern edge of the Los Angeles Forebay of the Central Basin.

During geotechnical investigations on the Campus, groundwater at depths between 25 and 54 feet was encountered across the north side of the Campus where the Pharmacy Building is located (GPI 2022 [Appendix F.5]). In 2018 and 2019, groundwater was encountered at depths from 10 to 18 feet where the Restorative Care Village is located (Geocon West, Inc. 2018 [Appendix F.2], 2019 [Appendix F.3]). The 2019 geotechnical investigation prepared by AECOM for the Women's and Children's Hospital Demolition observed groundwater conditions generally consistent with a 10- to 20-foot range, with deeper groundwater encountered locally in borings up to 81 feet (AECOM 2019 [Appendix F.4]). Historic groundwater monitoring data from wells on adjacent properties to the west, south, and east indicate that groundwater levels ranged from approximately 13 to 44 feet below the ground surface between 2005 and 2013 (Ninyo and Moore 2014).

The Project Site is not located within the boundaries of a groundwater basin managed by a Groundwater Sustainability Plan pursuant to the SGMA (SWRCB 2026).

The Los Angeles County Department of Public Works (LACDPW) manages 26 specialized spreading ground facilities to replenish local groundwater basins with stormwater and recycled water. These efforts, in collaboration with the Water Replenishment District, significantly increase local, sustainable water supplies, reducing reliance on imported water (LACDPW 2026).

The Campus is not located near stormwater spreading grounds. The nearest spreading ground is approximately 9 miles to the northwest at the LACDPW Headworks Reservoir East (LACDPW 2024).

FLOOD ZONES

FEMA identifies floodplain zones to assist cities with mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction within a 100-year floodplain. The 100-year floodplain is defined as an area that has a 1 percent chance of being inundated during a 12-month period. FEMA also prepares maps for 500-year floods, which means that in any given year, the risk of flooding in the designated area is 0.2 percent.

The Project Site is in Flood Zone X, which is an area that is outside of a 500-year floodplain, outside an area protected by a levee from a 100-year flood, and within an area of minimal flood hazard (FEMA 2008).

DAM INUNDATION ZONES

According to the online Dam Breach Inundation Map hosted by the Division of Safety of Dams, the Campus is not in a dam inundation zone (DSOD 2025). The three closest dams to the Campus are the Elysian dam, 1.76 miles to the northwest of the Campus; the Laguna Regulating Basin, 2.57 miles east of the Campus; and the Silver Lake dam, approximately 4 miles to the northwest of the Campus. None of these three dams put the Campus in a dam inundation zone. Therefore, the Campus is not in a designated flood inundation area.

SEICHES AND TSUNAMIS

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin such as a reservoir, harbor, lake, or storage tank. Seiches can be created by winds, earthquakes, or tsunamis. Bodies of water such as bays, harbors, lakes, reservoirs, or large aboveground storage tanks can experience seiches. The nearest body of water is the Elysian dam, which is 1.76 miles to the northwest of the Campus. A seiche at Elysian dam would cover a much smaller area than a catastrophic failure of the dam, and it is highly unlikely that any flood waters would reach the Campus because of the distance.

A tsunami is a great sea wave produced by undersea disturbances such as tectonic displacement or large earthquakes. The Campus is approximately 16 miles northeast of the Pacific Ocean and is not in a Tsunami Hazard Area (DOC 2025).

3.9.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section X, states that the Proposed Project would result in a significant impact related to hydrology and water quality if it would:

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

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i) Result in a substantial erosion or siltation on- or off-site.

    ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

    iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

    iv) Impede or redirect flood flows.

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

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

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future project and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Section 3.9.4, *Project Impact Analysis*, and 3.9.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant hydrology and water quality impacts with implementation of mitigation measures related to polluted runoff, groundwater impacts, erosion and sedimentation, and degrading water quality. See Table 3.9-1, *Summary of the 2014 Master Plan EIR Hydrology and Water Quality Impact Conclusions*.

Table 3.9-1 Summary of 2014 Master Plan EIR Hydrology and Water Quality Impact Conclusions

Significance Criteria[1]	Significance before Mitigation	Mitigation Measure[2]	Significance after Mitigation
HYD-1: Violate any water quality standards or waste discharge requirements.	Potentially Significant (construction) Potentially Significant (operation)	MM-HYD-1 MM-HYD-2	Less Than Significant (construction and operation)
HYD-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).	Less Than Significant (construction and operation)	MM-HYD-3 MM-HYD-4	Less Than Significant (construction and operation)
HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a	Less Than Significant (construction and operation)	MM-HYD-1	Less Than Significant

Table 3.9-1 Summary of 2014 Master Plan EIR Hydrology and Water Quality Impact Conclusions

Significance Criteria[1]	Significance before Mitigation	Mitigation Measure[2]	Significance after Mitigation
stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.			
HYD-4: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.	Less Than Significant	None	Less Than Significant
HYD-5: Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	Less Than Significant	None	Less Than Significant
HYD-6: Otherwise substantially degrade water quality.	Potentially Significant (construction) Potentially Significant (operation)	MM-HYD-5 MM-HYD-6	Less Than Significant
HYD-7: Contribute to inundation by seiche, tsunami, or mudflow.	Less Than Significant	None	Less Than Significant
HYD-8: Place housing within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary Map or Flood Insurance Rate Map or other flood hazard delineation map.	The lead agency determined in the 2014 NOP/IS that the 2014 Master Plan would result in no impacts in this topic area and was, therefore, screened from further review in the 2014 Master Plan EIR.		

Table 3.9-1 Summary of 2014 Master Plan EIR Hydrology and Water Quality Impact Conclusions

Significance Criteria[1]	Significance before Mitigation	Mitigation Measure[2]	Significance after Mitigation
HYD-9: Place within a 100-year flood hazard area structures that would impede or redirect flood flows.	The lead agency determined in the 2014 NOP/IS that the 2014 Master Plan would result in no impacts in this topic area and was, therefore, screened from further review in the 2014 Master Plan EIR.		
HYD-10: Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	The lead agency determined in the 2014 NOP/IS that the 2014 Master Plan would result in no impacts in this topic area and was, therefore, screened from further review in the 2014 Master Plan EIR.		

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which differ in some cases.
2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures in the 2014 Master Plan EIR.

3.9.4 Project Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction

The grading strategy for the Proposed Project would be designed to closely balance the tiered grades of the existing topography, accommodate the needs of the proposed building program, and provide improved circulation and ADA access throughout the Project Site. The Proposed Project includes site grading using excavated fill to reduce slopes along primary streets to less than five percent. Clearing, grading, excavation, and construction activities associated with implementation of the Proposed Project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, future development associated with the Proposed Project would require compliance with the SWRCB CGP Water Quality Order WQ 2022-0057-DWQ. The SWRCB mandates that projects disturbing one or more acres of land obtain coverage under the Statewide CGP. The CGP also requires that, prior to the start of construction activities, the Project Applicant file PRDs with the SWRCB, which includes a notice of intent, risk assessment, site map, annual fee, signed certification statement, and SWPPP.

An SWPPP requires the incorporation of BMPs to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. The construction contractor is required to maintain a copy of the SWPPP at the site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the Project Applicant is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of an SWPPP.

In addition, the County of Los Angeles requires that ESCPs, which are year-round BMP measures, be incorporated into certain construction plans. All grading projects, non-residential sites, residential sites of six stories or greater, and projects with soil-disturbing activities greater than one acre require an ESCP. Implementation of an ESCP would address any potential erosion issues associated with the Proposed Project's grading and site preparation activities. Furthermore, development associated with the Proposed Project would implement the requirements of the LACDPW BMP manual.

Submittal of the PRDs and implementation of SWPPPs and ESCPs, as applicable, throughout the Proposed Project construction phases would address anticipated and expected pollutants of concern as a result of construction activities. Development associated with the Proposed Project would comply with all applicable federal, State, and County water quality standards and waste discharge requirements. As a result, water quality impacts associated with Proposed Project construction activities would be **less than significant**.

Additionally, as detailed in Chapter 3.8, *Hazards and Hazardous Materials*, of this Draft SEIR, certain soils on the Project Site are contaminated and contain volatile organic compounds (VOCs) in soil vapor above screening levels, petroleum hydrocarbons in shallow soils, and methane in mapped Methane Zones, all of which would be encountered during grading and excavation. However, these impacts would be reduced with appropriate mitigation, as discussed in Chapter 3.8.

Impact HYD-1: Construction of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Mitigation: Implement Mitigation Measure HAZ-2.

Significance with Mitigation: Less than significant. Mitigation Measure HAZ-2 requires the preparation and implementation of a vapor intrusion mitigation plan. The plan shall include site-specific engineering controls designed to prevent intrusion of VOCs into occupied indoor spaces. This measure addresses the VOCs associated with redevelopment, undocumented fill, and soil management requirements. Compliance with federal, State, and local regulatory requirements, together with the implementation of project-specific abatement and remediation plans, would ensure that impacts on water quality during construction would be less than significant.

Operation

Operation of the Proposed Project would generate pollutants (e.g., in runoff from parking areas, solid waste storage areas, and landscaped areas) that could adversely affect the quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. Runoff from landscaped areas could also result in erosion and siltation. Additionally, an increase in impervious areas could result in an increase of runoff volume which could result in erosion and other hydrologic impacts on natural drainage systems.

Standards governing discharges to stormwater from the Project Site are regulated by the Los Angeles Regional MS4 Permit Order No. R4-2021-0105, NPDES No. CAS004004. The County of Los Angeles prepared the LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

LID techniques include source-control, site design, and treatment control BMPs. Source control BMPs reduce the potential for pollutants to enter runoff and are classified in two categories—structural and nonstructural. Structural source-control BMPs have a physical or structural component, such as inlet trash racks, trash bin covers, and an efficient irrigation system, to prevent pollutants from contacting stormwater runoff. Nonstructural source-control BMPs are procedures or practices used in project operation, such as stormwater training, or trash management and litter control practices. Site design BMPs relate to planning and design strategies that aim to reduce the volume of stormwater runoff and associated pollutants. Site design measures include limiting the area that is cleared, graded, and compacted on the Project Site; minimizing impervious surfaces; conserving the natural areas of the Project Site as much as possible; complying with stream setback ordinances; and protecting slopes and channels from erosion. Treatment control BMPs treat run-off through physical, biological, and chemical processes such as infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use.

For future development associated with the Proposed Project, the Project Applicant would prepare and submit project-specific SUSMPs to the LACDPW, which would include applicable LID

requirements in the MS4 permit and LID Standards Manual. Future development would be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by using design, treatment, and source control BMPs. The final LID-related BMPs to be implemented for future development under the Proposed Project would be determined through LACDPW's review of the project-specific SUSMPs, which would occur during the County's standard development review and building plan check process. The BMPs incorporated into future project development and activities would be required to treat, at a minimum, the first flush or the greater between the 85th percentile storm and first 0.75 inch of rainfall for any storm event, as required by the MS4 Permit. Furthermore, future project-specific SUSMPs would include the following information:

- Feasibility of infiltrating captured stormwater at the Project Site.
- Source control measure(s) proposed to be implemented.
- Calculation of the volume of stormwater that needs to be treated on the Project Site.
- Discussion on whether stormwater runoff harvest and use are feasible.
- Stormwater quality control measure(s) proposed to be implemented and sizing calculations.
- Proposed hydromodification controls and calculations (if necessary).
- Proposed maintenance plan (if necessary).

To meet the zero-trash discharge requirement of the Trash Amendments, all proposed catch basins would be equipped with full-capture catch basin inserts/inlet screens to remove trash/litter, debris, and sediment from runoff entering the City's storm drain system.

As discussed in Chapter 2, *Project Description*, the Proposed Project would use drought-tolerant and California native plants, which would be maintained by staff members who are trained to work with native California landscapes.

The Proposed Project would also comply with all State, County, and local regulations, such as the County of Los Angeles Code of Ordinances, Chapter 21, Stormwater and Runoff Pollution Control, regarding stormwater runoff during the operational phase, which would ensure that water quality standards and waste discharge requirements would not be exceeded, and surface water and groundwater quality would not be degraded. The Proposed Project would also comply with the County of Los Angeles Code of Ordinances Title 12, Chapter 12.84, Low Impact Development Standards to minimize pollutant loadings, erosion, and other hydrologic impacts on natural drainage systems. However, due to the large area of proposed landscaping, phosphorous is a likely pollutant in stormwater runoff from the Campus. Additionally, if bioretention BMPs are used, there is a potential for leaching of nutrients from growing media, allowing phosphorus to enter stormwater runoff. Landscaped-based LID features could also leach nutrients. Therefore, the Proposed Project would have potentially **significant** impacts.

Impact HYD-2: Operation of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Mitigation Measure HYD-2: During the initial design of each future project, the Project Applicant(s) shall prepare project-specific Stormwater Mitigation Plans (SUSMP) for review and approval by the Los Angeles County Department of Public Works (LACDPW). Low-impact development (LID) features included in project-specific SUSMPs shall be designed to minimize the leaching of nutrients from growing media. LID features shall avoid the use of growing media, mulch, and compost containing animal products, which may leach nutrients. Design modifications may include incorporation of an internal storage zone with an elevated underdrain and a carbon food source for denitrifying bacteria to create anaerobic conditions and subsequent denitrification.

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

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HYD-2 would require the implementation of SUSMPs that include LID features for all future activities under the Proposed Project to prevent the leaching of phosphorus. Mitigation Measure HYD-2 would also ensure the creation of Operations and Maintenance Plans as part of future development projects to ensure ongoing operations and maintenance of LID features and on-site landscaping to further prevent the leaching of phosphorus.

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

Construction

Excavations and below-grade construction at the Campus are expected to encounter groundwater. Therefore, seepage may be encountered because of the depth to groundwater at the Campus, and dewatering may be necessary depending on location of future activities under the Proposed Project.

Any discharges of groundwater during future construction activities would comply with applicable NPDES permit requirements. The dewatering system would be addressed per Statewide requirements in the CGP and the General Waste Discharge Requirement (WDR) Permit for Groundwater Discharges by LARWQCB. The CGP limits the quantity of groundwater discharge during dewatering, and the temporary nature of the construction dewatering would ensure that substantial lowering of the groundwater table would not occur. The WDR Permit requires permittees to monitor their discharges from groundwater extraction for waste from construction and dewatering activities to ensure that proposed effluent limitations are not exceeded. In addition, construction activities that would disturb more than one acre under the Proposed Project would be subject to SWPPP requirements, which would include measures for spill prevention, control, and containment that would prevent potential construction pollutants from leaching into shallow groundwater.

Construction activities associated with the Proposed Project would also comply with all applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for a release of contaminants into the groundwater as a result of construction. However, during the dewatering process, the Proposed Project has the potential to affect the groundwater level of the surrounding area which could trigger soil settlement. Differential soil settlement can cause tilting, and cracking in adjacent structures, as well as reduced load capacity for piles. Therefore, due to dewatering concerns, construction-phase impacts would be potentially **significant**.

Operation

The Campus is located on the northern edge of the Los Angeles Forebay of the Central Basin and is not near existing stormwater spreading grounds. The nearest spreading ground is approximately 9 miles northwest (LACDPW 2024). The Campus is not an active groundwater recharge site and, therefore, development associated with the Proposed Project would not substantially interfere with groundwater recharge.

As discussed in Chapter 3.17, *Utilities and Service Systems*, indoor water fixtures for development associated with the Proposed Project would comply with County of Los Angeles Code of Ordinance requirements related to reducing indoor water consumption. The County of Los Angeles Plumbing Code (Title 28 of the County of Los Angeles Code of Ordinances) references the California Plumbing Code, which establishes maximum flow rates for indoor water fixtures. Development associated with the Proposed Project would also comply with the requirements of Title 20, Section 20.09.010, Maintaining Existing Water-Efficient Landscapes, of the County's Code of Ordinances. These requirements would limit potential increases in water usage at the Project Site.

As discussed in Chapter 3.17, *Utilities and Service Systems*, of this Draft SEIR, the Proposed Project would result in a total water demand of approximately 814 acre-feet per year (AFY). The water demand projection in LADWP's 2020 Urban Water Management Plan (UWMP) was developed based on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) demographic projection by the Southern California Association of Governments (SCAG) for the LADWP's service area. The demographic projection was provided to LADWP from the Metropolitan Water District of Southern California, who collaborates with SCAG to aggregate demographic data for each of its 26 member agencies. LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045.

As shown in Appendix H, the Proposed Project is consistent with the demographic projections for the City from the 2020 RTP/SCS. Since LADWP's 2020 UWMP water demand projection is based off the 2020 RTP/SCS demographic projections, and the Proposed Project is consistent with the demographic projections from the 2020 RTP/SCS, the Proposed Project's anticipated water demand is accounted for within the projected water supplies in LADWP's 2020 UWMP for normal, single-dry, and multiple-dry years through the year 2045.

However, due to the large area of proposed landscaping and the associated increase in outdoor water demand, the Proposed Project could substantially decrease LADWP's groundwater supplies that may impede sustainable groundwater management. Therefore, this impact would be considered potentially **significant**.

Impact HYD-3: Construction and operation of the Proposed Project could substantially decrease groundwater supplies such that the Proposed Project may impede sustainable groundwater management.

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

Project Applicant(s) shall be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress shall be recorded. The baseline survey shall be submitted to the County and retained for reference during construction monitoring.

Mitigation Measure HYD-3b: During project design, the Project Applicant(s) shall retain a qualified civil or water resources engineer to prepare a Recycled and Alternative Water Supply Feasibility Study evaluating the technical and economic feasibility of using non-potable water sources for landscape irrigation. The study shall identify feasible sources, projected supply volumes, system design concepts, and implementation costs.

Based on the results of the feasibility study, future projects shall incorporate all technically and economically feasible non-potable supply systems into the final landscape irrigation supply. Irrigation water demands greater than existing irrigation demands shall be met by alternative supply sources to the maximum extent technically feasible. The use of alternative water supply sources for irrigation shall be maximized to reduce the use of potable water for irrigation and to approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, reclaimed water, gray water, harvested rainwater (stormwater), and air-conditioning condensate (although not specifically mentioned in the master plan, this could represent a significant source of clean irrigation water).

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HYD-3a and Mitigation Measure HYD-3b would reduce impacts related to the decreased groundwater supplies to less than significant levels. These measures monitor groundwater levels and decrease groundwater use for irrigation. Compliance with federal, state, and local regulatory requirements and implementation of mitigation would ensure that the Proposed Project would not interfere with groundwater supplies or recharge. Therefore, the Proposed Project's potential to create a significant hazard to the public or environment through decreased groundwater supplies or recharge would be less than significant with the implementation of Mitigation Measures HYD-3a and HYD-3b.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

- **i) Result in a substantial erosion or siltation on- or off-site?**
- **ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?**
- **iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
- **iv) Impede or redirect flood flows?**

Erosion and Siltation

Construction

As discussed in impact discussion (a), the grading strategy for Proposed Project is intended to accommodate the needs of the proposed building program and also provide improved circulation and ADA access throughout the Project Site. Construction activities would involve grading, excavation, and soil exposure. These types of construction activities have the potential to cause erosion or siltation. If not controlled, erosion and siltation could temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. To minimize erosion and siltation, future activities under the Proposed Project would be required to comply with the requirements in the State's CGP, including preparation of a Notice of Intent and SWPPP if projects with soil-disturbing activities greater than one acre, prior to the start of construction activities. The SWPPP would describe the BMPs to be implemented during project's construction activities. BMPs that could be implemented during the construction phase could include the following to limit erosion and siltation.

- Minimize disturbed areas of construction sites.
- Install on-site sediment basins to prevent off-site migration of erodible materials.
- Implement dust-control measures, such as silt fences and regular watering of open areas.
- Stabilize construction entrances/exits.
- Install storm drain inlet protection measures.
- Install sediment control measures around the site, including silt fences or gravel bag barriers.

Adherence to the BMPs in SWPPPs and ESCPs would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. The construction-phase BMPs would also ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides). Therefore, Project-related

construction activities would not result in substantial erosion or siltation on- or off-site. Construction-related impacts would be **less than significant**, and no mitigation is required.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Once development projects within the Project Site are constructed, the requirements of the MS4 permit for new development or redevelopment projects must be implemented and would include site design, source control, LID, and treatment measures that address stormwater runoff and would reduce the potential for erosion and siltation. Site design measures include limiting the area that is cleared, graded, and compacted on the Project Site; minimizing impervious surfaces; conserving the natural areas of the Project Site as much as possible; complying with stream setback ordinances; and protecting slopes and channels from erosion. LID measures include the use of permeable pavements, directing runoff to pervious areas, and the construction of bioretention areas. Projects subject to hydromodification must also maintain the pre-project creek erosion potential by implementing various control measures. Therefore, impacts would be **less than significant**.

Impact HYD-4: Operation of the Proposed Project could result in substantial erosion or siltation on- or off-site.

Mitigation: Implement Mitigation Measure HYD-2.

Significance with Mitigation: Less than significant.

Flooding On- or Off-Site

Construction

Water would be used during the temporary construction phase of the Proposed Project (e.g., for dust suppression). However, the water would be mechanically and precisely applied and would infiltrate or evaporate. Therefore, the rate or amount of surface runoff resulting from the Proposed Project's construction activities would be similar to the amount under existing conditions. Additionally, potential future development disturbing more than one acre would be required to prepare and implement project-specific SWPPPs which would limit the volume of construction runoff. Construction activities associated with the Proposed Project that meet the requirements of an ESCP would also be required to prepare and implement ESCPs, thus limiting the discharge of stormwater runoff from the Project Site. Furthermore, Chapter 21 of the County of Los Angeles Code of Ordinances regulates stormwater and non-stormwater discharges to the facilities of LACFCD for the protection of those facilities. Therefore, during construction, the Proposed Project would not result in a substantial increase in the rate or

amount of surface runoff or flooding on- or off-site. Impacts would be **less than significant**, and no mitigation is required.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

New development and/or redevelopment and changes in land uses could result in an increase in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities.

Pursuant to LACDPW requirements, as detailed in the County of Los Angeles Hydrology Manual and the County of Los Angeles Hydraulic Design Manual, development under the Proposed Project would be required to have site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems prior to LACDPW approval. Development associated with the Proposed Project would be required to comply with site-specific "allowable discharge rates," as identified by the LACDPW, that limit post-Project peak flow discharges compared to existing conditions, thus minimizing the potential for flooding on- or off-site and exceedance of the capacity of existing or planned stormwater drainage systems. Per LACDPW procedures, the Project Applicant must submit the hydrology and hydraulic studies to the LACDPW for review and approval prior to the issuance of grading permits for individual development projects associated with the Proposed Project. Adherence to these regulatory requirements would minimize the amount of stormwater runoff from the Proposed Project. Therefore, the Proposed Project would not result in flooding on- or off-site. Impacts would be **less than significant**, and no mitigation is required**.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Stormwater Drainage System Capacity

Construction

All potential future development disturbing more than one acre would be required to prepare and implement project-specific SWPPPs which would limit the volume of construction runoff entering the storm drainage system. Additionally, construction activities associated with the Proposed Project that meet the requirements of an ESCP would be required to prepare and implement ESCPs, thus limiting the discharge of stormwater runoff from the Project Site. Furthermore, Chapter 21 of the County of Los Angeles Code of Ordinances regulates stormwater and non-stormwater discharges to the facilities of LACFCD for the protection of those facilities. If during construction, future projects affect an LACFCD easement or storm drain, then the Project Applicant would attain a LACFCD Permit to perform any work,

encroachment, or activity within or affecting its right-of-way, facilities, interests, or jurisdiction. Therefore, impacts would be **less than significant**, and no mitigation is required.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Routine structural BMPs that could be used as part of the Proposed Project include filtration, runoff-minimizing landscaping for common areas, energy dissipaters, inlet trash racks, and water quality inlets. Before the Proposed Project is implemented, the Proposed Project storm drain plan would be prepared and reviewed by the County of Los Angeles to ensure that the on-site storm drain systems and treatment facilities can accommodate stormwater runoff from the Project Site and would not exceed the capacity of downstream drainage systems at the point of connection. Also, development under the Proposed Project would be required to have site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems prior to approval by the LACDPW. The Proposed Project would be required to comply with site-specific "allowable discharge rates," as identified by the LACDPW, that limit post-Project peak flow discharges compared to existing conditions, thus minimizing the potential for flooding on- or off-site and exceedance of the capacity of existing or planned stormwater drainage systems. The stormwater control BMPs would be consistent with LA County General Plan 2035 Policies C/NR 6.1, 6.5, and 7.4 because operation of the Proposed Project would include stormwater control measures. Additionally, the Proposed Project would be consistent with the County of Los Angeles Code of Ordinances, specifically Chapter 12.84 and Chapter 21, which seek to lessen the adverse impacts and regulate stormwater runoff. Although compliance with City regulations is not required, the Proposed Project achieves consistency with City regulations, offering an added benefit by aligning with local objectives for stormwater infiltration and stormwater quality improvement.

Development as part of the Proposed Project would be in a developed urban area with existing impervious surfaces and existing storm drain systems that would be improved and appropriately sized to meet the needs of the Proposed Project. With the implementation of site-specific hydrology and hydraulic studies and adherence to LACDPW's allowable discharge rates, there would not be a significant increase in stormwater runoff to the City and County's storm drain system. With implementation of these control measures and regulatory provisions to limit runoff from new development sites, the Proposed Project would not result in significant increases in runoff that would exceed the capacity of existing or planned storm drain facilities. The impact would be **less than significant**, and no mitigation is required**.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Impeding or Redirecting Flood Flows

Construction and Operation

According to FEMA FIRM No. 06037C1637F, the Project Site is within the Flood Zone Designation X, which indicates areas with reduced minimal flood which is outside of a 500-year floodplain and outside an area protected by a levee from a 100-year flood (FEMA 2008). Implementation of the Proposed Project would include a storm drain system to collect, treat, and convey stormwater into the existing storm drain system in the surrounding area. Therefore, the Proposed Project would not result in impeding or redirecting flood flows. This impact would, therefore, be **less than significant**, and no mitigation is required.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction and Operation

According to the Dam Breach Inundation Map Web Publisher hosted by the Division of Safety of Dams, the Project Site is not within a dam inundation zone (DSOD 2025). The three closest dams to the Project Site are the Elysian dam, which is approximately 1.7 miles to the northwest of the Project Site; the Laguna Regulating Basin, which is approximately 2.5 miles east of the Project Site; and the Silver Lake dam, which is approximately 4 miles to the northwest of the Project Site. The Project Site is not within the dam inundation zone for these three dams. Therefore, the Project Site is not in a designated dam inundation area.

The Project Site is within FEMA Flood Zone Designation X, which indicates areas with a minimal flood hazard. Therefore, the Project Site is not expected to be at risk of flooding.

A seiche is a surface wave created when a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake or storage tank, is shaken, usually by earthquake activity. There are no major water-retaining structures immediately upgradient from the Project Site. Flooding from a seismically induced seiche is considered unlikely.

The Project Site is not also within a tsunami inundation area. Hence, no tsunami inundation risk is expected for the Proposed Project site.

Therefore, the Proposed Project would not have the potential to result in the risk of releasing pollutants due to flood hazards, tsunami, or seiche zones. This impact is **less than significant**, and no mitigation is necessary.

Significance without Mitigation: Less than significant. No mitigation is necessary.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Construction

Adherence to the State CGP, implementation of the project-specific SWPPPs, and adherence to the County's Code of Ordinance requirements would ensure that surface and groundwater quality are not adversely impacted during construction. As a result, construction activities associated with the Proposed Project would not obstruct or conflict with implementation of the LARWQCB's Basin Plan. Impacts would be **less than significant**.

As previously identified, the Campus is not located within a groundwater basin that is managed by a Groundwater Sustainability Agency. Therefore, construction activities associated with the Proposed Project would not conflict or obstruct the implementation of a sustainable groundwater management plan. No impact would occur.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Project Site is not located within the boundaries of a groundwater basin managed by a Groundwater Sustainability Plan (SWRCB 2026).

The Project Site would be connected to LADWP's water supply. LADWP manages water supplies to ensure withdrawals from groundwater basins do not exceed the safe yield for these basins, as per the "Upper Los Angeles River Area Judgment," which was a judicial decree that defined the City's groundwater rights. However, due to the large area of proposed landscaping, phosphorous could be a likely pollutant in stormwater runoff from the Project Site if fertilizers, pesticides, and herbicides containing animal manure or animal products are used. If landscaped-based LID features are used, these features could leach nutrients for the same reason. If biorientation BMPs are used, there could also be a potential for leaching of nutrients from growing media containing animal products. Therefore, without a set procedure in place, this impact would be potentially **significant**.

Impact HYD-5: Operation of the Proposed Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Mitigation: Implement Mitigation Measure HYD-2.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HYD-2 would reduce impacts related to conflict with a water quality control plan. This measure requires the implementation of LID features to prevent phosphorus from leaching into the ground. This measure would also require the creation of an Operations and Maintenance Plan. Compliance with federal, State, and local regulatory requirements and implementation of mitigation would ensure that the Proposed Project would not interfere with a water quality control plan or sustainable groundwater management plan.

3.9.5 Cumulative Impact Analysis

The study area for potential cumulative hydrology and water quality impacts to surface water consists of the Los Angeles River Watershed since this watershed defines the entire area that drains to the Los Angeles River. The watershed boundary represents the natural physical boundary within which water flows, pollutants accumulate, and hydrology is altered and, therefore, is representative of the cumulative water quality and hydrology impacts to the Los Angeles River. While the Los Angeles River Watershed represents the appropriate geographic context for evaluating cumulative hydrologic and stormwater conditions, the Los Angeles River Watershed boundary is not used as the basis for identifying individual cumulative projects. The study area for potential cumulative impacts to groundwater are LADWP's groundwater supply sources.

It should be noted that the study area identified in the 2014 Master Plan EIR was a one-mile radius around the Campus. A one-mile radius was not chosen for the analysis of cumulative impacts for Hydrology and Water Quality in this Draft SEIR due to the broader impact hydrology and water quality topics have on the surrounding area. The cumulative analysis considers the potential for development and redevelopment within the Los Angeles River Watershed, including the 13 identified cumulative projects listed in Chapter 3, *Environmental Analysis*, in combination with the Proposed Project. Potential cumulative impacts would occur if the Proposed Project, in combination with the identified cumulative projects, would result in significant impacts related to hydrology and water quality resources.

The 2014 Master Plan EIR determined that the 2014 Master Plan project would not result in cumulatively considerable impacts related to hydrology and water quality.

Would the project have a cumulative effect related to hydrology or water quality?

Water Quality

Construction

Cumulative construction impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable project, collectively result in substantial adverse impacts related to water quality.

Construction activities associated with cumulative projects could generate pollutants, such as sediment, fuels, oils, concrete washout, and other construction-related materials, that could degrade surface water quality if not properly controlled. The Proposed Project could similarly contribute to cumulative water quality impacts during construction through grading, excavation, and other earth-disturbing activities that could generate sediment or introduce pollutants to stormwater runoff.

All construction projects that disturb one acre or more of land would be required to prepare and implement SWPPPs and obtain coverage under the Statewide CGP. Additionally, all projects within the unincorporated areas of the County of Los Angeles would be required to adhere to the County's Code of Ordinances, which includes regulations and standards related to stormwater and non-stormwater discharges and developing and implementing erosion-control plans. Cumulative projects within the City of Los Angeles would comply with the City's municipal code requirements related to stormwater management. The Proposed Project would also be required to comply with the Statewide CGP and the requirements of the County's Code of Ordinances and implement BMPs during construction to minimize pollutant discharges to stormwater. Therefore, construction activities associated with the Proposed Project would not substantially degrade water quality or result in a cumulatively considerable contribution to cumulative water quality impacts. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative operational impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively result in substantial adverse impacts related to water quality within the Los Angeles River Watershed.

Operation of cumulative projects could introduce pollutants into stormwater runoff through urban land uses, vehicle-related pollutants, landscape maintenance activities, and other routine site activities. The Proposed Project could similarly contribute to cumulative water quality impacts during operation through stormwater runoff generated from developed surfaces.

All designated projects within the watershed would also be required to implement LID BMPs pursuant to the MS4 permit, which would minimize water pollution from project operation. However, there is still potential that future development under the Proposed Project would result in leach of nutrients from growing media. Absent mitigation, this contribution would be cumulatively considerable. Impact would be potentially **significant**.

Impact HYD-6: Operation of the Proposed Project, together with past, present, and reasonably foreseeable projects, could violate water quality standards or discharge requirements or otherwise substantially degrade surface or groundwater quality.

Mitigation: Implement Mitigation Measure HYD-2.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HYD-2, which requires preparation of an Operations and Maintenance Plan for LID features and the use of integrated pest management and organic maintenance practices, would reduce the potential for pollutants to enter stormwater runoff during project operation. Therefore, although cumulative development could contribute to degraded water quality within the watershed, compliance with regulatory requirements and implementation of Mitigation Measure HYD-2 would ensure that the Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant**.

Groundwater

Construction

Cumulative construction impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable project, collectively resulted in substantial adverse impacts related to groundwater.

Construction activities associated with cumulative projects could encounter groundwater during excavations and below-grade construction activities. Therefore, dewatering may be required. Dewatering systems would be addressed per Statewide requirements in the CGP and the General WDR Permit. The CGP limits the quantity of groundwater discharge during dewatering, and the temporary nature of the construction dewatering would ensure that substantial lowering of the groundwater table would not occur. The WDR Permit requires permittees to monitor their discharges from groundwater extraction for waste from construction and dewatering activities to ensure that proposed effluent limitations are not exceeded. In addition, construction activities that would disturb more than one acre would be subject to SWPPP requirements, which include measures for spill prevention, control, and containment that would prevent potential construction pollutants from leaching into the shallow groundwater.

Cumulative projects would also comply with all applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous materials to reduce the potential for a release of contaminants into the groundwater because of construction.

However, there is still potential that construction activities associated with future development under the Proposed Project would affect groundwater level of the surrounding area, which could trigger soil settlement. Differential soil settlement can cause tilting, and cracking in adjacent structures, as well as reduced load capacity for piles. Absent mitigation, this contribution would be cumulatively considerable. Impact would be potentially **significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative operational impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable project, substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

The Campus is not near existing stormwater spreading grounds and cumulative development would not be allowed within active groundwater recharge sites; therefore, the Proposed Project and cumulative projects would not substantially interfere with groundwater recharge.

As shown in Appendix H, the Los Angeles County Department of Economic Opportunity has determined that the anticipated water demand for the Proposed Project and future anticipated growth with LADPW's service area is accounted for within the projected water supplies in LADWP's 2020 UWMP for normal, single-dry, and multiple-dry years through the year 2045.

Cumulative projects within the County would also comply with County of Los Angeles Code of Ordinance requirements related to reducing water consumption including the County of Los Angeles Plumbing Code (Title 28 of the County of Los Angeles Code of Ordinances), and Title 20, Section 20.09.010, Maintaining Existing Water-Efficient Landscapes, of the County's Code of Ordinances. Cumulative projects within the City of Los Angeles would comply with the requirements of the City's Municipal Code including Chapter IX, Article 4, Plumbing Code, and Chapter XII, Article V, Water Efficiency Requirements for New Development and Renovation of Existing Buildings. These requirements would limit potential increases in water usage.

However, due to the large area of proposed landscaping and the associated increase in outdoor water demand, the Proposed Project could substantially decrease groundwater supplies that may impede sustainable groundwater management of the basin. Absent mitigation, this contribution would be cumulatively considerable. Impact would be potentially **significant**.

Impact HYD-7: Construction and operations of the Proposed Project, together with past, present, and reasonably foreseeable projects, could substantially decrease groundwater supplies such that the Proposed Project may impede sustainable groundwater management of the basin

Mitigation: Implement Mitigation Measures HYD-3a and 3b.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure HYD-3a and Mitigation Measure HYD-3b would reduce impacts related to the decreased groundwater supplies to less than significant levels. These measures monitor groundwater levels and decrease groundwater use for irrigation. Therefore, compliance with regulatory requirements and implementation of Mitigation Measures HYD-3a and 3b would ensure that the Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant**.

Hydrology and Drainage

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively result in substantial adverse impacts to hydrology and drainage in the Los Angeles River Watershed.

Cumulative projects within the Los Angeles River Watershed could increase impervious areas and increase stormwater runoff rates, which could impact hydrology and drainage in the cumulative study area. However, all cumulative projects disturbing more than one acre would be required to prepare and implement a SWPPP which would limit the volume of construction runoff. Projects within the unincorporated area of the County of Los that meet the requirements of an ESCP would also be required to prepare and implement ESCPs, thus limiting the discharge of stormwater runoff from the project sites during construction. Furthermore, Chapter 21 of the County of Los Angeles Code of Ordinances regulates stormwater and non-stormwater discharges to the facilities of LACFCD for the protection of those facilities. Any new development would also be subject, on a project-by-project basis, to the applicable level of independent environmental review as well as applicable federal, State, regional, and local regulations, including municipal or County design guidelines and other applicable policies and procedures for stormwater systems. Projects in the region would also be required to limit post-development runoff discharges per the requirements of the County of Los Angeles Hydraulic Design Manual. In addition, the Proposed Project would comply with all relevant provisions in the County of Los Angeles Code of Ordinances. Thus, no significant cumulative drainage impacts would occur, and cumulative project drainage impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively result in substantial adverse impacts to hydrology and drainage within the Los Angeles River Watershed.

Operational cumulative development within the Los Angeles River Watershed could increase impervious surface area, which could increase stormwater runoff volumes and alter local drainage patterns. However, projects within the Los Angeles River Watershed are required to comply with applicable stormwater management regulations, including the requirements of the NPDES MS4 Permit and the County of Los Angeles Hydraulic Design Manual. These regulations require implementation of LID features and stormwater management practices designed to control runoff rates, reduce peak flows, and maintain post-development drainage conditions that are consistent with or improved relative to existing conditions.

Additionally, projects are subject to review by the applicable lead agency's department of public works to ensure that drainage infrastructure is designed to adequately convey stormwater flows and prevent adverse impacts to downstream drainage facilities. Compliance with these regulatory requirements would reduce the potential for cumulative increases in runoff or drainage system failures associated with regional development.

Therefore, cumulative hydrology and drainage impacts during project operation would be less than significant, and the Proposed Project's contribution to any cumulative impact would not be cumulatively considerable. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Flooding

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable project, collectively result in substantial adverse impacts related to release of pollutants due to flooding.

All cumulative projects disturbing more than one acre would be required to prepare and implement project-specific SWPPPs which would limit the volume of construction runoff. Additionally, construction activities within the unincorporated area of the County of Los that meet the requirements of an ESCP would also be required to prepare and implement ESCPs, thus limiting the discharge of stormwater runoff from the project sites. If during construction, cumulative projects affect an LACFCD easement or storm drain, then the project proponent would attain a LACFCD Permit to perform any work, encroachment, or activity within or

affecting its right-of-way, facilities, interests, or jurisdiction. Therefore, impacts would be **less than significant**, and no mitigation is required.

Operation

Projects in the Los Angeles River Watershed may be constructed within 100-year flood zones or tsunami inundation zones. Projects within the 100-year flood zone would be mandated to purchase flood insurance through the National Flood Insurance Program. In addition, other jurisdictions within the watershed regulate development within flood zones and in compliance with FEMA standards to limit cumulative flood hazard impacts. Therefore, cumulative impacts to flooding would be **less than significant**, and impacts of the Proposed Project would not be cumulatively considerable.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Project Inundation

Construction and Operation

Cumulative impacts related to pollutant inundation would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively increase the potential for people or structures to be exposed to pollutants transported by floodwaters or other inundation hazards within the Los Angeles River Watershed.

The Project Site is not located within a dam inundation zone, FEMA-designated flood hazard area, or tsunami inundation zone, and flooding from a seismically induced seiche is considered unlikely because there are no major water-retaining structures immediately upgradient from the Project Site. As a result, floodwaters or other inundation hazards would not be expected to occur at the Project Site that could mobilize construction-related pollutants.

Because the Project Site is not located within areas subject to inundation hazards and construction and operational activities would be subject to regulatory controls designed to prevent pollutant releases, the Proposed Project would not contribute to cumulative pollutant inundation impacts within the watershed. Impacts would be **less than significan**t.

Plan Consistency/Implementation

Construction

Cumulative impacts related to conflicts with a water quality control plan or sustainable groundwater management plan would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively result in the degradation of surface or

groundwater quality or otherwise interfere with the implementation of regional water quality protection programs within the Los Angeles River Watershed.

Construction activities associated with cumulative development projects could generate stormwater runoff containing sediment, fuels, oils, and other construction-related pollutants that could degrade water quality if not properly controlled. The Proposed Project could similarly contribute to cumulative impacts during construction through grading, excavation, and other earth-disturbing activities that could generate sediment or introduce pollutants into stormwater runoff.

However, construction activities that disturb one acre or more are required to obtain coverage under the Statewide CGP and prepare and implement a SWPPP. The SWPPP must include BMPs designed to minimize erosion, sediment transport, and pollutant discharges from construction sites. Compliance with the CGP and implementation of SWPPP measures are intended to ensure consistency with the Los Angeles RWQCB Basin Plan, which establishes water quality objectives and implementation programs designed to protect surface and groundwater resources.

In addition, the Project Site is not located within a groundwater basin managed by a Groundwater Sustainability Plan under the Sustainable Groundwater Management Act. Therefore, construction of the Proposed Project would not conflict with or obstruct implementation of a groundwater sustainability plan.

The Proposed Project would be required to comply with the above regulatory requirements during construction, which would minimize the potential for construction-related pollutant discharges that could conflict with the Basin Plan or other applicable water quality protection programs. Therefore, although cumulative construction activities within the watershed could contribute to stormwater pollutant loading, the Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts related to conflicts with a water quality control plan or sustainable groundwater management plan would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects, collectively result in degradation of surface or groundwater quality or interfere with the implementation of regional water quality management objectives within the Los Angeles River Watershed.

The Project Site is not located within a groundwater basin managed by a Groundwater Sustainability Plan under Sustainable Groundwater Management Act. Therefore, operation of the Proposed Project would not conflict with or obstruct implementation of a groundwater sustainability plan.

Operational activities associated with cumulative projects could generate stormwater runoff containing pollutants such as hydrocarbons, metals, nutrients, and other contaminants that could degrade water quality if not properly managed. The Proposed Project could similarly contribute to cumulative impacts through stormwater runoff generated from developed surfaces, landscaped areas, and routine site maintenance activities.

However, projects within the watershed are required to comply with the NPDES MS4 Permit, which requires implementation of LID features and stormwater treatment measures designed to capture and treat runoff prior to discharge to the storm drain system or receiving waters. These requirements are intended to ensure consistency with the Los Angeles RWQCB Basin Plan, which establishes water quality objectives and implementation measures designed to protect beneficial uses of regional water bodies. However, due to the large area of proposed landscaping, phosphorous could be a likely pollutant in stormwater runoff from the Campus if fertilizers, pesticides, and herbicides containing animal manure or animal products are used. If landscaped-based LID features are used, these features could leach nutrients for the same reason. If biorientation BMPs are used, there could also be a potential for leaching of nutrients from growing media containing animal products. Absent mitigation, this contribution would be cumulatively considerable. Impact would be potentially **significant**.

Impact HYD-8: Operation of the Proposed Project, together with past, present, and reasonably foreseeable projects, could conflict with a water quality control plan.

Mitigation: Implement Mitigation Measure HYD-2.

Significance with Mitigation: Less than significant. With the implementation of Mitigation Measure HYD-2, which requires preparation of an Operations and Maintenance Plan for LID features and the use of integrated pest management and organic maintenance practices, would further reduce the potential for pollutants to enter stormwater runoff during project operation. Therefore, although cumulative development could contribute to degraded water quality within the watershed, compliance with regulatory requirements and implementation of Mitigation Measure HYD-2 would ensure that the Proposed Project's contribution would not be cumulatively considerable. Impacts would be **less than significant**.

3.9.6 Comparison to the 2014 Master Plan EIR Impact Analysis

The 2014 Master Plan EIR, as shown in Table 3.9-1, *Summary of the 2014 Master Plan EIR Hydrology and Water Quality Impact Conclusions*, and this Draft SEIR resulted in similar impact conclusions. As described in Section 3.9.4, *Project Impact Analysis*, and Section 3.9.5, *Cumulative Impact Analysis*, the Proposed Project would result in several potentially significant impacts related to water quality and groundwater. In the 2014 Master Plan EIR, mitigation measures were identified to address water quality and groundwater impacts. These measures reduced impacts to less-than-significant levels (County of Los Angeles 2014).

In this Draft SEIR, the mitigation measures from the 2014 Master Plan EIR have been reevaluated based on the elements of the Proposed Project, current conditions, and the current regulatory setting. Mitigation Measure HYD-1 from the 2014 Master Plan EIR addressed water quality impacts during construction; however, Mitigation Measure HYD-1 from the 2014 Master Plan EIR required compliance with existing regulations; State CEQA Guidelines Section 15126.4(a)(5) states that compliance with existing laws are not considered mitigation. The regulatory requirements remain in place and, therefore, Mitigation Measure HYD-1 from the 2014 Master Plan EIR have not been included in this Draft SEIR. Mitigation Measure HYD-2, Mitigation Measure HYD-3, Mitigation Measure HYD-5 and Mitigation Measure HYD-6 have been modified, retained, and renumbered as Mitigation Measure HYD-2 in this Draft SEIR. While the overall development intensity is greater than that analyzed in the 2014 Master Plan EIR, this Draft SEIR is consistent with prior findings that no significant and unavoidable impacts related to hydrology and water quality would result from implementation of the Proposed Project. Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

3.9.7 References

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3.10 LAND USE AND PLANNING

This chapter of the Draft SEIR discusses the existing land use and planning conditions of the Project Site and vicinity and identifies associated regulatory requirements. This section also identifies potential impacts that could result from future development and implementation of the Proposed Project, and as necessary, recommends mitigation measures to avoid/reduce the significance of impacts.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025 to November 21, 2025, comments were received regarding the land use and planning impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comments are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. Comments related to land use and planning were considered in the preparation of this analysis.

3.10.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

No federal land use regulations are applicable to the Proposed Project.

STATE

California Planning and Zoning Law

The legal framework in which California cities and counties exercise local planning and land use functions is set forth in the California Planning and Zoning Law, Sections 65000 through 66499.58. Under State of California planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how they create a general plan, but some fundamental requirements must be met. These requirements include seven mandatory elements described in the Government Code, including an element on land use. Each of the elements must contain text and descriptions with

objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures (CA Legislative Info. 2025).

REGIONAL

Southern California Association of Governments

Under federal law, the Southern California Association of Governments (SCAG) is designated as a metropolitan planning organization (MPO); under State law it is a regional transportation planning agency and council of governments (COG) for the County of Los Angeles, including the Project Site. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles (SCAG 2025b). The agency develops long-range RTPs, including Sustainable Communities Strategies (SCS) and growth forecast components; regional transportation improvement programs; RHNA allocations; and a portion of the South Coast Air Quality Management District's air quality management plans.

The Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) is a long-range regional plan that identifies strategies that provide efficient movement of people, goods, and information; enhance economic growth and international trade; and improve the environment and quality of life (SCAG 2024). The RTP/SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the region to lower greenhouse gas (GHG) emissions. As part of the RTP/SCS, the Southern California Association of Governments (SCAG) develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region. The County relied on SCAG's 2012-2035 RTP/SCS growth forecasts at the time the 2014 Master Plan EIR was prepared.

SCAG adopted its current RTP/SCS, "Connect SoCal 2024," in April 2024. The document provides the long-range vision for the SCAG region (SCAG 2024). Connect SoCal 2024 expands land use and transportation strategies established in previous cycles of the RTP/SCS to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal 2024 contains plans and projections for the region's future. Like other RTPs/SCSs, Connect SoCal 2024 provides a policy framework for preparing local plans and handling issues of regional significance, such as land use and housing, open space and biological habitats, water, energy, air quality, solid waste, transportation, security and emergency preparedness, economy, and education. Connect SoCal 2024 also strives to achieve broader regional objectives, such as encouraging diverse housing construction in areas supported by multiple transportation options; promoting development of complete streets that prioritize safe opportunities to walk bike, and pursue other forms of active transportation; leveraging new transportation technologies and data-driven solutions to efficient travel; and promoting conservation of natural lands. Connect SoCal 2024 advances regional planning by incorporating an integrated approach between SCAG, state and local

governments, transportation commissions, resources agencies and conservation groups, the private sector, and the general public (SCAG 2024).

LOCAL

County of Los Angeles General Plan 2035

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) was adopted in 2015. The LA County General Plan 2035 consists of 10 elements; several elements have been updated since its adoption, with the most recent update in 2025 for the Land Use and Safety Elements (County of Los Angeles 2025). The LA County General Plan 2035 serves as an advisory document to provide decision-makers with a policy framework for achievement of the General Plan's stated goals and policies. The LA County General Plan 2035 provides the policy framework for how and where the unincorporated County will grow through the year 2035 while recognizing and celebrating the County's wide diversity of cultures, abundant natural resources, and status as an international economic center. The LA County General Plan 2035 accommodates new housing and jobs in unincorporated areas of the County in anticipation of population growth in the County and the region. LA County General Plan 2035 provides goals, policies, and implementation programs to guide the long-term physical development and conservation of resources in the unincorporated areas of the County. Table 3.10-2, *Proposed Project's Potential to Conflict with Applicable Land Use Plans*, lists specific land use policies relevant to the Proposed Project although it is not located in the unincorporated County.

County of Los Angeles Code of Ordinances

Development within the unincorporated County of Los Angeles is governed by the County of Los Angeles Code of Ordinances, which establishes regulations related to land use, building standards, and public health and safety. Relevant provisions include Title 22 (Planning and Zoning), which establishes zoning regulations, permitted land uses, and development standards applicable to unincorporated areas of the County, and Title 26 (Building Code), which establishes requirements for building design, construction, and occupancy to ensure structural integrity and life safety. Additional provisions of the County Los Angeles Code of Ordinances address grading, drainage, fire safety, and other development-related requirements. Compliance with the applicable provisions of the County of Los Angeles Code of Ordinances may be required for development under the Proposed Project although it is not located in the unincorporated County.

County of Los Angeles Requirements for Temporary Traffic Controls

The County of Los Angeles has established requirements for temporary traffic controls (TTC) and access for any permitted activity within the County public rights-of-way when temporary disruption of traffic is implemented, which supplements Part 6 of the "Greenbook" Standard Specifications for Public Works Construction (County of Los Angeles 2016).

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) has 11 citywide elements, including the Land Use Element, which is composed of 34 Community Plans. The Framework Element is the organizing element that connects all the elements of the General Plan. The Framework Element (adopted 1996 and readopted in 2001) is a strategy for long-term growth that sets a citywide context to guide the subsequent amendments of the City's Community Plans, zoning ordinances, and other pertinent programs (City of Los Angeles 2001). As a comprehensive, long-range document containing purposes, policies, and programs for the development of the City of Los Angeles, the Framework Element responds to State and federal mandates to plan for the City's future.

The Project Site is within the boundaries of the City's Northeast Los Angeles Community Plan area of the City and is adjacent to the Boyle Heights Community Plan area. The Boyle Heights Community Plan area borders the Project Site on the south.

The Northeast Los Angeles Community Plan, adopted in 1999, designates the Project Site as Public Facilities (PF); public facilities include fire stations, libraries, schools, parks, and police stations (City of Los Angeles 1999). Additionally, the areas around the Project Site are designated Light Industrial, Medium Multiple Family Residential, and Community Commercial by the Northeast Los Angeles Community Plan (City of Los Angeles 1999).

The properties located southwest of the Project Site, on the opposite side of Marengo Street, are identified as Neighborhood Commercial, Public Facilities, Multiple Family Medium, Open Space and Residential Low Density under the Boyle Height Community Plan (City of Los Angeles 2014).

The Northeast Los Angeles Community Plan provides goals, policies, and objectives on a variety of topics, such as land use, housing, urban form, open space, transportation, infrastructure, and public services. The following goals and objectives from the Northeast Los Angeles Community Plan are relevant to the potential off-site impacts of the Proposed Project (City of Los Angeles 1999):

Objective 1-1 To preserve and enhance existing residential neighborhoods.

Objective 1-2 To allocate land for new housing to accommodate a growth of population that is consistent with and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and government services, especially schools.

Objective 1-4 To preserve and enhance neighborhoods with distinctive and significant historical or architectural character.

Objective 3-2	To provide existing and future industrial uses that contribute job opportunities for residents and minimize adverse environmental and visual impacts on the community.
Objective 4-2	To preserve existing open space resources and, where possible, encourage acquisition.
Objective 5-1	To conserve, expand, maintain, and better utilize existing recreation and park facilities to address the recreational needs of the community.
Objective 8-1	To provide adequate police facilities and personnel to correspond with population and service demands.
Objective 9-1	Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.
Objective 10-1	To comply with citywide performance standards for acceptable levels of service and ensure that necessary road access and street improvements are provided to accommodate traffic generated by all new development.
Objective 11-2	To increase the work trips and non-work trips made on public transit.
Objective 14-1	To ensure that the plan area's significant cultural and historical resources are protected, preserved, and/or enhanced.
Objective 14-3	To enhance and capitalize on the contribution of existing cultural and historical resources in the community.

City of Los Angeles Zoning Code

The City of Los Angeles Planning and Zoning Code includes standards for different land uses and identifies which land uses are allowed in various zoning districts. Specifically, the zoning code consolidates and coordinates all existing zoning regulations and provisions to designate, regulate, and restrict locations and land uses. As shown in Figure 3.10-1, *Existing Zoning*, the Project Site is zoned Public Facilities (PF-1) (City of Los Angeles Municipal Code [LAMC] sec. 12.04.09). According to LAMC Section 12.04.09, the PF-1 zoning district permits public health facilities, including clinics and hospitals. PF-1 zoning does not have restrictions regarding the heights of buildings or any specific front-, side-, or rear-yard setbacks (City of Los Angeles 2025a).

The properties to the northwest between Alhambra Avenue and Mission Road, between Daly Street and Hancock Street, and outside the boundaries of the Project Site are zoned Light Industrial (M2), PF-1, Multiple Dwelling (R3), and Open Space (OS). The properties to the northeast along Zonal Avenue between Mission Road and Soto Street and outside the boundaries of the Project Site are zoned PF-1, OS, and Commercial (C2). The properties to the southeast along Chicago Street between Zonal Street and Marengo Street are zoned PF-1, R3, and C2. The properties to the south along Marengo Street between Chicago Street and Mission

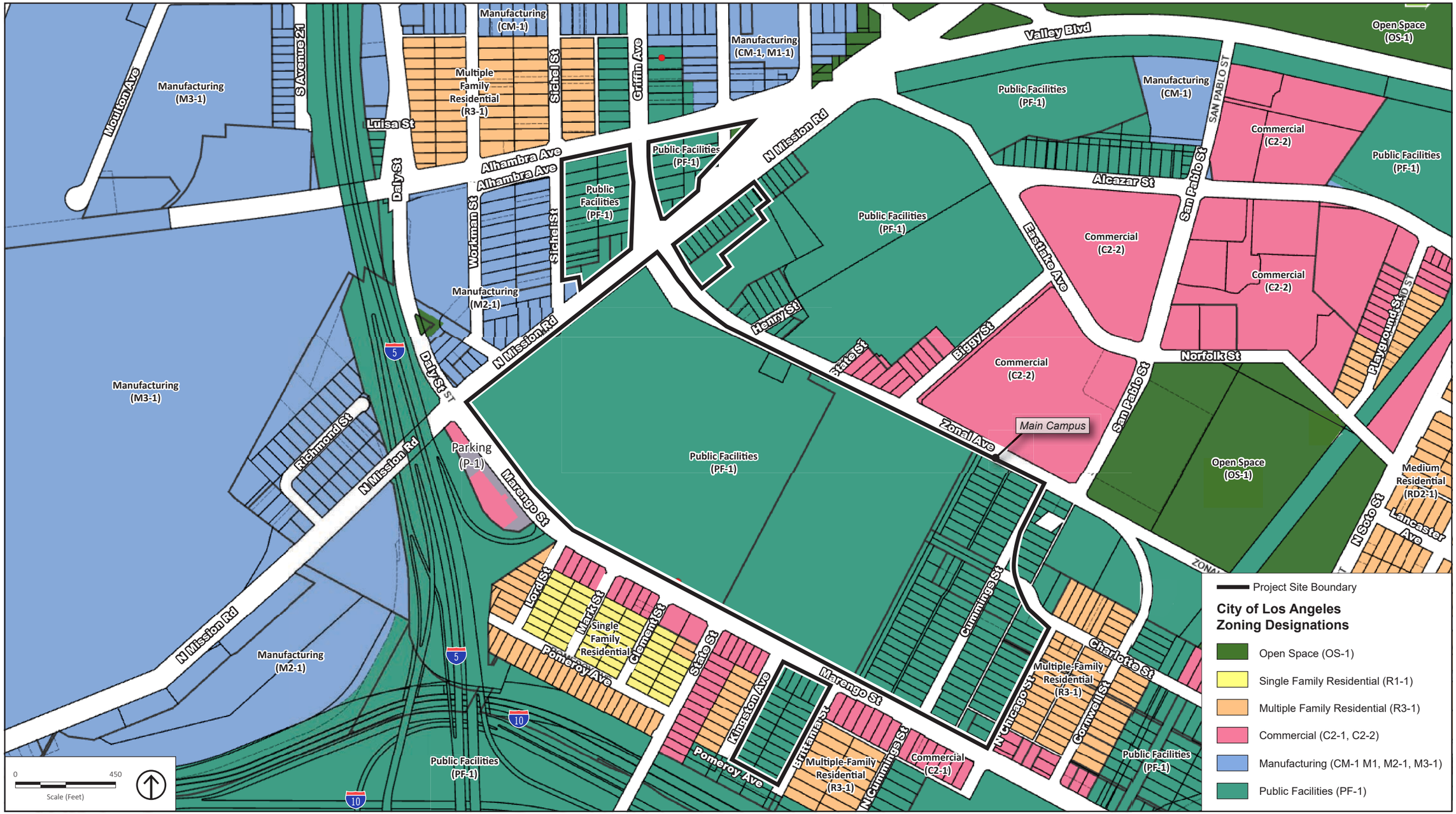
Road and outside the boundaries of the Project Site are zoned C2, R3, One-Family (R1), Commercial (C4), M2, Automobile Parking (P), and PF-1 (City of Los Angeles 2025b).

City of Los Angeles Municipal Code

Section 80.08.6 of the City of Los Angeles Municipal Code identifies that where the City of Los Angeles Department of Transportation determines that an unusual hazard exists to life or property, or that unusual congestion or impedance to traffic movement exists or is likely to occur, the Department shall install such traffic control devices as are required by its findings to control such hazard, congestion or impedance to traffic movement. Such devices shall be effective for a period not to exceed thirty (30) days and shall be marked “temporary”. Temporary traffic signs (No Parking) shall be further marked “Commercial Vehicles with Use Permit Exempt” when the Department determines the need for such control in conjunction with a use permit for filming in accordance with Los Angeles Administrative Code Chapter 13, Article 8, Division 22 (City of Los Angeles 2025).

The City’s Transportation Department may install traffic control devices as are necessary to provide the public with the most efficient use of the available curb space upon those streets or at those locations wherever authorized signs are in place giving notice that stopping or standing is prohibited, and where “Tow Away” restrictions are not included on the “No Stopping” or “No Parking” signs, or where the Council Office representing such street determines that a temporary condition will exist where the need for on-street parking will not detrimentally affect the public welfare, and where the Department determines that unrestricted parking will not result in an unusual hazard to life or property, or unusual congestion or impedance to traffic movement. Traffic control devices shall be effective for a period not to exceed thirty (30) days and shall be marked “temporary”. These temporary “Parking Permitted” signs shall specify the days and times when the “Parking Permitted” signs are in effect, and these signs shall override any other “No Parking” or “No Stopping” restrictions at the same location, except where “Tow Away” restrictions are also posted, or where there are colored curb zones (City of Los Angeles 2025).

Figure 3.10-1 - Existing Zoning



Source: https://zimas.lacity.org/

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California Redevelopment Project Area – Adelante Eastside Redevelopment Plan

Community Redevelopment Areas (CRA) are areas, pursuant to California Redevelopment Law, that were identified for revitalization through the building of new housing and commercial projects. Prior to 2012, the Community Redevelopment Agency of Los Angeles (CRA/LA) was the agency in charge of developing, implementing, and overseeing CRA projects in the City of Los Angeles (City of Los Angeles 2018). The passing of AB1x-26 and the California Supreme Court's decision in the *California Redevelopment Association v. Matosantos* in 2012 effectively dissolved redevelopment agencies in the State. Since the dissolution of the CRA/LA, activities in the redevelopment project areas have been administered through the Designated Local Authority (DLA). In 2019, pursuant to Assembly Bill 1484 and City Council resolution, all "land use related plans and functions" of the DLA transferred to the City of Los Angeles.

The Project Site is located within one CRA, the Adelante Eastside Redevelopment Plan area, which expires in March 2031 (CRA/LA 1999). The Adelante Eastside Redevelopment Plan was originally adopted in 1999 and, in 2003, the Adelante Eastside Redevelopment Project Area/Plan merged with the existing Whiteside Redevelopment Project Area/Plan. As of 2013, the Adelante Eastside Redevelopment Plan has been implemented and enforced by the City. The land use related plans and functions of the Adelante Eastside Redevelopment Plan transferred to the City in November 2019. The key objectives of relevance in the Adelante Eastside Redevelopment Plan that are applicable to the Proposed Project include:

- Improve the quality of the environment, promote a positive image for the area and provide a safe and secure environment through mechanisms such as:
  - Adopting land use standards;
  - Promoting architectural and urban design standards;
  - Promoting landscape criteria and planting programs to ensure additional green space;
  - Promoting sign and billboard standards;
  - Integrating public safety concerns
- Support and encourage a circulation system that will improve the quality of life in the Redevelopment Plan Area, including pedestrian, automobile, parking, and mass transit systems with emphasis on serving existing facilities and meeting future needs.
- Promote and support the conservation, rehabilitation, and appropriate use or reuse of existing buildings, groupings of buildings, and other physical features.
- Promote a thriving commercial environment, including adequate parking and proper traffic circulation, which contributes to neighborhood improvement and positively relates to adjacent land uses.

The Adelante-Eastside Redevelopment Pan include policies for land uses within the Project Site. According to the Adelante-Eastside Redevelopment Plan, the Project Site is identified as Open Space and Residential. Section 500 of the Adelante Eastside Redevelopment Plan includes

policies for land uses permitted in the Adelante Eastside Redevelopment Plan area. These policies include policies for commercial, residential, and industrial uses; commercial uses within residential areas and industrial areas; residential uses within commercial areas; as well as open space and other public uses.

Specifically, as identified in Section 504.4, *Open Space and Other Public and Quasi-Public Uses*, areas identified as Public/Quasi-Public/Open Space uses shall be used for open space and/or institutional purposes including but not limited to public facilities, school sites, nonprofit medical facilities, public services, open space and recreation areas (CRA/LA 2009).

3.10.2 Existing Conditions

The Project Site is in the easternmost part of the City of Los Angeles and is within the boundaries of the Northeast Los Angeles Community Plan area and adjacent to the Boyle Heights Community Plan area. As discussed in further detail in Chapter 3, *Environmental Analysis*, the main campus is generally bordered by Marengo Street to the southwest, Chicago Street and Cummings Street to the southeast, Zonal Avenue to the northeast, and North Mission Road to the northwest. The College of Nursing and Allied Health and Restorative Care Village (RCV) Phase III properties are located north of Mission Road and south of Alhambra Avenue. The Big Blue property is located east of Zonal Avenue and south of Mission Road. The Parking Structure 9 property is located south of Marengo Street and north of I-10, between Kingston Avenue and Brittania Street.

The Project Site is in a completely developed area that supports a variety of land uses, as described below.

PROJECT SITE

As shown on Figure 3-1, *Existing Campus Configuration*, the entirety of the Project Site is developed with buildings and structures that make up and support the Los Angeles General Medical Center. Specifically, the Project Site includes medical and office uses, parking facilities, open spaces, and maintenance facilities to support the continued operation of these critical community-serving uses. Currently, the main campus east of State Street is heavily utilized for outpatient and hospital functions. This area holds the original General Hospital building (now largely vacant), the Los Angeles General Medical Center Replacement Hospital and Central Plant (completed in 2008), the Outpatient Department (OPD) building, and the Clinic Tower (constructed in 2008). The Replacement Hospital consists of four contemporary buildings. Also east of State Street is the Interns and Residents Dormitory (IRD) building, which is currently used for hospital administrative offices, and parking structure 12.

Most of the Project Site west of State Street is underutilized, with a large amount of surface parking lots and ornamental landscaping. Many of the buildings in this area are not fully

functional, and several Campus programs are currently housed in temporary buildings or trailers. However, it should be noted that portions of this area were redeveloped or under construction at the time this Draft SEIR was prepared. Specifically, Phase I of the Recuperative Care Village was constructed on a portion of the Project Site northwest of State Street, southwest of Zonal Avenue, and southeast of Coroner Road and was completed in April 2022. Additionally, a replacement childcare center was constructed on a portion of the Project Site generally west of State Street and east of the terminus of the existing tunnel/viaduct and was completed in January 2023. A permanent supporting housing project (Phase III of the RCV) is under construction at the RCV property. The former Women's and Children's Hospital site at the southeast corner of Mission Road and Zonal Avenue is under construction for Phases IV and V of the RCV.

Major building clusters include the General Hospital, which sits on top of the hill just east of State Street. General Hospital was built in 1933, along with two administrative buildings, a gatehouse, and utility tunnel and bridge. Several modular structures have been added at the historic entry plaza, as well as to the north, east, and south of General Hospital.

The College of Nursing and Allied Health property consists of a cluster of Spanish Colonial buildings that house facilities for administration, counseling, social work, facilities support, and clinical support as well as parking lot 14.

The RCV property is currently under construction with a permanent supportive housing facility.

The Big Blue property is at the southeast corner of Mission Road and Zonal/Griffith Avenue, across from the main campus. This property consists of the Rand Schrader Clinic; the Carpenter's Mill building (known as "Big Blue"), and parking lot 6A.

Parking Structure 9 is located on the opposite side of Marengo Street, across from the main campus.

SURROUNDING LAND USES

A variety of land uses are in the area surrounding the Project Site, including County/public, residential, commercial, industrial, medical, and institutional uses. Multi-family residential neighborhoods are to the east along Chicago Street, north of Alhambra Avenue, and southwest of Marengo Street, southeast of State Street. A residential neighborhood with a mix of single-family and multi-family residences are southwest of Marengo Avenue, northwest of State Street. Additionally, multi-family residences are located along Charlotte Street, between Cornwell Street and Cummings Street. It should be noted that the multi-family residences along Charlotte Street are bordered to the north, east, and west, by ornamental landscaping.

The USC Health Sciences campus, which includes the Keck School of Medicine, USC School of Pharmacy, Keck Hospital, and the USC Norris Comprehensive Cancer Center, is just north of the

Project Site across Zonal Avenue. Various commercial uses as well as the Saint Camillus Catholic Center and the County of Los Angeles Juvenile Court campus are also north of the Project Site across Zonal Avenue. Hazard Recreation Center is to the northeast, and Lincoln Park is located further to the northeast. Francisco Bravo Medical Magnet High School is southeast of the Project Site at the northeast corner of Cornwell Street and Charlotte Street. Several County-operated services are in proximity to the Project Site. Commercial uses line Marengo Street to the southwest, and commercial and industrial uses are north and west the main campus.

3.10.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines, Section XI, states that the proposed project would result in a significant impact related to land use and planning if it would:

a) Physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

METHODOLOGY

As previously discussed, the County has elected to analyze the Proposed Project for consistency with its own planning and zoning regulations although the Project Site is not located in the unincorporated County. The County is exempt from a city's planning and zoning ordinances when County-owned property is in a city. However, local plans and policies of the City of Los Angeles were reviewed to analyze the off-site land use and planning impacts that could result from the Proposed Project (i.e., related infrastructure improvements). The approach used for this analysis considered existing conditions at the time the NOP was issued

As described in Chapter 2, *Project Description*, *t*he Proposed Project involves implementation of the Master Plan and , which would guide the long-term redevelopment of parts of the Project Site, including adaptive reuse of the General Hospital Building. The Master Plan presents a conceptual, planning-level vision of the types of uses, scale, and locations of potential future development activities that could occur within a 30.8-acre portion of the approximately 81.9-acre Project Site, referred to as the "Master Plan Boundary" in the proposed Master Plan (see Section 1, Introduction, of the proposed Master Plan), The Master Plan Boundary covers that portion of Project Site that is the subject of the public-private partnership between the DEO on behalf of the County and the developer to reimagine the Campus through implementation of the Master Plan. Detailed site development plans, building configurations, and architectural

designs would be prepared as future project-level approvals are proposed and would be consistent with the guiding vision of the proposed Master Plan.

The approximately 51.1 acres of the Project Site that are not subject to the proposed Master Plan would continue to be governed by the previously approved 2014 Master Plan and its associated development parameters.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Section 3.10.4, *Project Impact Analysis*, and 3.10.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan (and subsequent projects analyzed through addenda to the 2014 Master Plan EIR) would not result in significant land use and planning impacts. Table 3.10-1, *Summary of the 2014 Master Plan EIR Land Use and Planning Impact Conclusions*, provides an overview of previous land use and planning impacts analyses for the Campus.

Table 3.10-1 Summary of the 2014 Master Plan EIR Land Use and Planning Impact Conclusions

Significance Criteria[1]	Significance without Mitigation	Mitigation Measure	Significance with Mitigation
LU-1: Would the project physically divide an established community?	Less Than Significant (construction) No Impact (operation)	None	Less Than Significant (construction) No Impact (operation)
LU-2: Would the Proposed Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Source: County of Los Angeles 2014

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

3.10.4 Project Impact Analysis

a) Would the project physically divide an established community?

The physical division of an established community typically refers to the construction of a physical feature (such as a wall, airport, interstate highway, or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. It also refers to the placement of a development in such a manner that it physically divides or separates an established community.

Construction

Future development and activities that implement the Proposed Project would result in the construction of new uses and facilities or the renovation/reuse of existing uses and facilities. Construction activities have the potential to physically divide the surrounding neighborhoods or community through lane closures and the obstruction of pedestrian pathways, and it is essential that continued access—including emergency access and community access to the hospital uses—remain throughout phased construction. The Proposed Project's construction activities have the potential to temporarily modify access to and from the surrounding communities due to lane closures along the surrounding roadways and construction traffic. While temporary lane closures or traffic control measures (e.g., flagging, detours) may occur, these measures would be designed to maintain access to all adjacent properties and surrounding communities. The Proposed Project would comply with the County's Temporary Traffic Control Requirements to reduce impacts to access on-site and would comply with the City's Temporary Traffic Control Plan to reduce impacts to access off-site (see Section 3.15, *Transportation*).

For on-site circulation, construction staging and access routes would be coordinated to ensure continued internal access throughout the Campus. County requirements governing construction access, emergency vehicle access, and site circulation would be implemented and would ensure that internal roadways and access points remain functional during construction activities. All construction activities would be conducted in close partnership with existing County and hospital uses to ensure the Campus remains accessible from the surrounding area. Off-site construction activities, including potential lane closures or temporary traffic control measures along surrounding roadways, could temporarily modify access to and from the surrounding communities. However, implementation of a traffic control plan, in accordance with Proposed Project Mitigation Measure TRA-1 (refer to Chapter 3.15, *Transportation*, of this Draft SEIR) would ensure that safe and adequate access to adjacent properties, residences, businesses, and emergency services is maintained at all times. Such measures may include phased lane closures, detours, flagging operations, advance notification, and signage. As a result, while access patterns may be temporarily adjusted during construction, access to all properties in the surrounding communities would be maintained and the Proposed Project would not result in the physical division of an established community.

Therefore, the Proposed Project's temporary land use construction impacts related to the physical division of an established community would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

As stated in Section 2.3, *Statement of Project Objectives*, of this Draft SEIR, the Proposed Project includes objectives to improve connectivity between the Project Site and the surrounding community. Specifically, the Proposed Project aims to redevelop the Campus with a mixed-use community designed to promote healthy lifestyles and wellness, enhance integration with adjacent institutions and neighborhoods, and integrate landscaping and open space with an abundance of public and semi-public gathering places to support a range of community activities. Additionally, the Proposed Project would include internal circulation improvements, in accordance with the objective to redesign and replace the aging utilities and infrastructure within the Campus, that would increase connectivity within the Project Site and to the surrounding communities outside the Project Site.

Specifically, as discussed in Section 2.4.3, *Circulation and Access*, of this Draft SEIR, key circulation features that would ensure connectivity to surrounding communities include the following:

- **Mobility Hub:** A Mobility Hub could be strategically located to enhance access to existing surrounding bus lines and the existing internal campus shuttle. The mobility hub could be located at the Mission Street and Marengo Boulevard entries. Other multimodal features such as bicycle parking and repair stations, shade and seating areas, rideshare drop-offs, a fleet of car-share vehicles, and bus charging infrastructure, could be provided.
- **Shuttle Circulation:** Two existing Campus shuttle routes serve the Campus. The Proposed Project would expand the routes to improve circulation throughout the main campus. Shuttle stops would be aligned with key drop-offs, gateways, and destinations. A central shuttle branch is proposed along the Wellness Corridor and would permit only authorized vehicular access within the bollard-protected pedestrian zone.
- **State Street Spine:** The existing alignment of State Street through the Project Site would be maintained, and the roadway could be transformed into a central access feature to support vehicles, pedestrians, and bikes, and include Americans with Disabilities Act (ADA)-compliant pathways.
- **Central Spine:** The Central Spine would form the primary axis to connect the western portion of the main campus to the eastern portion of the main campus. The Central Spine would provide a direct and visible pedestrian pathway and would increase connectivity between the western and eastern portions of the main campus.
- **Pedestrian Network:** The Proposed Project could include a layered system of trails, ramps, elevators, stairways, and terraces to connect open spaces and key destinations in

consideration of the unique topographic grade changes on the Project Site. The proposed ground plan would be designed to encourage movement and comfort, with curb-less streets, textured pavers, shade trees, lighting, seating, and landscape amenities to define a public realm. The Proposed Project would include a pedestrian-protected road, which would prevent non-emergency vehicular traffic using motorized bollards, and could be accessed from either Zonal Avenue, Mission Road, or Marengo Street. These bollards can be removed to allow emergency vehicles to get through the area.

- **Accessible Pathways:** Site grading would use excavated fill to reduce slopes along primary street to less than five percent.
- **Fitness Loop:** The Proposed Project could provide a connected network of fitness pathways within the main campus. Along the routes, exercise stations, pocket parks, and shaded rest areas could be provided.
- **Bicycle Path:** Bicycle circulation on the Project Site builds on the existing Class II bikeway along Mission Road, which connects to networks along the Los Angeles River and towards Downtown Los Angeles. Public bicycle parking stations would be provided at each entry point of the main campus. Within the main campus, the Proposed Project would provide dedicated bicycle lanes along the Wellness Corridor and State Street. Each proposed residential building would include secure, residential-only bicycle parking. Designated bicycle parking would be provided on Marengo Street, at the State Street entrance, and at the primary Mission Road entrance.
- **Service and Emergency Access: T**he Proposed Project would include a service loop to support County of Los Angeles Department of Health Services (DHS) trams, waste transfer, loading, and deliveries with minimal public interference. Service and loading operations would be consolidated along a proposed dedicated service entry, potentially from Marengo Street. This service corridor would provide controlled access to County uses. The loading dock for the adaptive reuse of the General Hospital Building would connect to the existing basement service network at the east end of the building. Loading areas would be designed to be located away from primary pedestrian ingress and egress areas by at least 20 feet. Wherever feasible, loading areas would be located at the rear of the building. The Proposed Project's street network would be designed to provide comprehensive fire and emergency access to all buildings within the main campus while preserving the existing access lanes to facilities outside the main campus.

The proposed uses and redevelopment at the Project Site would be limited to the existing boundaries of the Project Site and would not result in the closure, realignment, or permanent modification of any existing off-site public rights-of-way, street, or pedestrian pathways that connect the Project Site to the surrounding communities. No new physical barriers or infrastructure that would impede connectivity between neighborhoods would be introduced. No surrounding residential neighborhoods would be divided due to the Proposed Project. Therefore, operational impacts related to division of an established community are **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Construction

During construction, temporary activities such as grading, building construction, staging, and lane closures have the potential to result in short-term disturbances, but these activities would be conducted in accordance with applicable County regulations governing construction practices. Construction would not alter the land use designation of the Project Site, preclude implementation of adopted plans, or conflict with land use policies adopted for the purpose of avoiding or mitigating an environmental effect. As construction activities are temporary and would not result in permanent changes to the land use patterns or adopted policy implementation, no significant land use conflict would occur during construction. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The analysis in Table 3.10-2, *Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations*, evaluates the consistency of the Proposed Project with applicable local and regional land use plans, policies, and regulations intended to avoid or mitigate environmental effects under long-term operational conditions. Though the Proposed Project would be phased over 25 years, the analysis considers its consistency with current land use plans and policies. The City's regulations are included to address off-site impacts that could result from implementation of the Proposed Project.

The Proposed Project's potential to conflict with other applicable plans and regulations adopted for the purpose of avoiding or mitigating an environmental effect is also discussed in Chapter, 3.1, *Aesthetics*; Chapter 3.2, *Air Quality*, Chapter 3.3, *Biological Resources*; Chapter 3.5, *Energy*; Chapter 3.6, *Geology and Soils*; Chapter 3.7, *Greenhouse Gas Emissions*; Chapter 3.9, *Hydrology and Water Quality*; Chapter 3.11, *Noise*; Chapter 3.15, *Transportation*; Chapter 3.17, *Utilities and Service Systems*; and Chapter 3.18, *Wildfire*.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Connect SoCal 2024	
Communities: Develop, connect and sustain communities that are livable and thriving.	**No Conflict.** The Proposed Project supports this goal by implementing a Master Plan that would guide the long-term redevelopment of parts of the Project Site to enhance accessibility and connectivity within the Project Site and to the surrounding community. The enhancement of accessibility and connectivity within the Project Site and surrounding community could support livable and thriving communities by increasing opportunities for employment and access to communal spaces.
Environment: Create a healthy region for the people of today and tomorrow.	**No Conflict.** The Proposed Project would support this goal by accommodating complementary residential and employment-generated land uses, as well as modern health care uses and facilities. The collocation of residential and employment-generating uses under the Proposed Project provides a variety of employment opportunities and housing choices in an interconnected, walkable setting, thereby promoting livability and sustainability. The Proposed Project in total represents efficient use of available land, contributes to local and regional economies, and expands and diversifies employment and housing opportunities. Additionally, as discussed in Chapter 2, *Project Description*, of this Draft SEIR, the Proposed Project would include sustainable features such as adaptive reuse of the General Hospital Building.
County of Los Angeles General Plan 2035	
Land Use Element	
Policy LU 5.3: Support a mix of land uses that promote bicycling and walking, and reduce VMTs.	**No Conflict.** The Project Site is located within a high-quality transit corridor (Metro Line J) and is located within a half mile of a major transit stop. The Proposed Project would introduce a variety of new land uses in a walkable, interconnected campus setting and within a half mile of a high-quality transit corridor in the City of Los Angeles. Additionally, the Proposed Project proposes a floor area ratio (FAR) of 2.2, which is higher than the 0.75 FAR screening criteria for vehicle miles traveled. As discussed in Chapter 3.15, *Transportation*, of this Draft SEIR, the Proposed Project would screen-out from preparing a VMT assessment and would be presumed to have a less-than-significant VMT impact. Moreover, the Proposed Project would include transportation demand management measures and could include up to two mobility hubs. The Proposed Project co-locate jobs, housing, and neighborhood-serving uses, which would facilitate a multimodal environment. Based on the preceding analysis, due to the Project Site's proximity to a high-quality transit corridor and major transit stop, the Proposed Project's mix of land uses that could promote bicycling and walking, operation of the Proposed Project could reduce VMTs.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building, enclosure, and other design techniques.	**No Conflict.** As discussed in Chapter 2.0, *Project Description*, of this Draft SEIR, the Project Site is surrounded by a mix of uses, including public facilities (including the County-owned and operated Juvenile Hall), residential, commercial, industrial, medical, and institutional uses. The Proposed Project's land uses were developed with the surrounding land uses and community context in mind. The as discussed in Chapter 2, *Project Description*, the proposed Master Plan includes development standards that aim to guide development and create a cohesive community character. Additionally, the accompanying Use and Development Standards that are part of the proposed Master Plan would establish permitted uses, development intensity limits, and design-related standards intended to promote compatibility with surrounding uses. A description of the proposed development standards is provided in Chapter 2.0, *Project Description*, of this Draft SEIR. The land uses under the Proposed Project would be consistent and compatible with the existing uses within and surrounding the Project Site. Specifically, the proposed light industrial uses would be limited to hybrid industrial uses that would be subject to size and distancing requirements to prevent health and safety impacts on sensitive receptors.
Policy LU 10.4: Promote environmentally-sensitive and sustainable design. **Policy LU 11.1:** Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies. **Policy LU 11.3:** Encourage development to optimize the solar orientation of buildings to maximize passive and	**No Conflict.** One of the objectives of the Proposed Project is to promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure system, and reduced reliance on single-occupancy vehicle travel. The proposed Master Plan would modernize aging utilities and infrastructure to support long-term campus operations and includes design requirements (e.g., a massing strategy) for future development on the Project Site. Future development and implementation activities would be required to be consistent with current applicable building code requirements, which at this time include the requirement for solar-ready buildings.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
active solar design techniques.	
Policy LU 11.2: Support the design of development that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.	**No Conflict.** The Proposed Project would include landscaping throughout the Project Site. Specifically, the proposed Master Plan would include landscaping requirements within the Campus that would comply with applicable local landscaping standards. As discussed in Section 2.4.4, *Open Space and Landscaping*, of this Draft SEIR, the proposed landscaping would include California drought tolerant lawn, shrubbery, flower, and/or trees. The proposed pedestrian network would also feature shade trees. The Proposed Project would increase green and vegetated areas and would increase tree canopy cover to create habitat corridors and connectivity with other major vegetative resources in the region.
Air Quality Element	
Policy AQ 2.4: Encourage land use development and design that integrates GHG emission reduction strategies through increasing residential density and infill development, especially affordable housing and diversity of destination near High-Quality Transit Areas.	**No Conflict.** The Proposed Project would result in infill development that would redevelop parts of the Project Site a mix of uses in a walkable environment near high-quality transit. The Proposed Project would introduce new residential uses and increase residential density within a quarter mile of a high-quality transit corridor and major transit stop, which would support transit use, walking and bicycling and reduce reliance on single-occupancy vehicle trips and associated vehicle miles traveled and GHG emissions. Moreover, the Proposed Project would introduce additional employment opportunities on-site, which would promote a jobs-housing balance by providing employment opportunities for surrounding residents and future on-site residents, thereby reducing the need for longer vehicle trips and associated emissions. The mix of uses under the proposed Master Plan would also facilitate internal trip capture and pedestrian connectivity within the Project Site. Additionally, the proposed Master Plan would include sustainability features intended to reduce operational emissions, such as energy-efficient building design, electrification, water conservation measures, and other sustainability strategies implemented consistent with applicable regulations and programs. Accordingly, the Proposed Project would support this policy.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Policy AQ 3.6: Support local solar power generation on new and existing buildings and parking lots.	**No Conflict**. See discussion of Policies LU 11.1 and LU 11.3.
Conservation and Natural Resources Element	
Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts. **Policy C/NR 14.1:** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible. **Policy C/NR 14.3**: Support the preservation and rehabilitation of historic buildings.	**No Conflict.** The Project Site includes several scenic resources, including the General Hospital and Forecourt (a contributor). The Proposed Project would result in the adaptive reuse of the General Hospital and forecourt. The Proposed Project would retain the historic architectural features of the General Hospital Building, which would remain an important and historic focal point on the Project Site. The Proposed Project includes demolition of the Pharmacy Building and tunnel/viaduct, which was not analyzed in the 2014 Master Plan EIR. However, as discussed in Chapter 3.4, *Cultural Resources*, the Pharmacy Building and tunnel viaduct are not individually eligible as historic resources under any local, State, or federal registration criteria. Additionally, as discussed in Chapter 3.4, the Proposed Project construction activities, that are in proximity to historical resources, have the potential to result in significant and unavoidable impacts to the historical resources. Additionally, as discussed in Chapter 3.4, the Proposed Project's construction activities have the potential to uncover previously undiscovered archeological resources; mitigation has been identified to reduce the Proposed Project's potential to result in adverse impacts on archaeological resources to a less than significant level. Moreover, as discussed in Chapter, 3.6, *Geology and Soils*, there is a potential for previously undiscovered paleontological resources to be uncovered during the Proposed Project's construction; mitigation has been identified to reduce the Proposed Project's potential to result in adverse impact on paleontological resources to a less than significant level. Although the Proposed Project would result in significant and unavoidable impacts related to historic resources, the Proposed Project is consistent with these policies because the Proposed Project would include Use and Development Standards that would protect scenic resources; implement mitigation measures to reduce impacts on historic, cultural and paleontological resources to the greatest extent feasible; and would support the preservation and rehabilitation of historic buildings.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Noise Element	
Policy N 1.1: Utilize land uses to buffer noise-sensitive uses from sources of adverse noise impacts. **Policy N 1.2:** Reduce exposure to noise impacts by promoting land use compatibility. **Policy 1.11:** Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/light industrial uses.	**No Conflict.** The Project Site is currently developed with uses and structures associated with Los Angeles General Medical Center Campus, which includes but is not limited to medical-oriented uses, professional/administrative offices, warehouse/storage, and utility/maintenance facilities. The Proposed Project would introduce new land uses that would be compatible with surrounding land uses in the vicinity of the Project Site. Consistent with Assembly Bill 1307, noise generated by residential occupants and their guests shall not be treated as a significant environmental effect under CEQA. Therefore, the Proposed Project's new residential uses would not introduce a substantial noise source to the Project Site. Additionally, the Proposed Project's new educational uses would generate noise that is typical of school uses. These noises are common with urban and institutional campuses and would be comparable to existing human activity levels already present on-site. The Proposed Project would introduce a variety of new mechanical equipment throughout the Project Site, which would include rooftop heating, ventilation and air conditioning (HVAC) equipment, and ventilation fans for subterranean parking. The mechanical equipment associated with new buildings would be designed to meet the intent of applicable noise performance standards. Incorporating principles of equipment siting, shielding, and attenuation into system design would minimize the potential for noise from mechanical equipment to contribute to ambient noise levels at on-site and off-site receptors. The new proposed land uses would be in strategic areas of the Project Site, guided by the proposed regulatory framework, to ensure compatibility between existing and proposed land uses. Potential noise impacts of the Proposed Project are addressed in detail in Chapter 3.11, *Noise*, of this Draft SEIR. As discussed in Chapter 3.11, the Proposed Project's operational noise impacts would be less than significant with mitigation incorporated. The mitigation measures would require all mechanical equipment and outdoor use areas be designed to comply with applicable County noise standards to reduce impacts at off-site noise receptors (e.g., equipment locations and outdoor event layout).

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Safety Element	
Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones. **Policy S 1.2:** Prohibit construction of structures for human occupancy adjacent to active faults unless a comprehensive fault study that addresses seismic hazard risks and proposes appropriate actions to minimize the risk is approved.	**No Conflict.** As discussed in Chapter 3.6, *Geology and Soils*, of this Draft SEIR, the Project Site is in a seismically active area of Southern California; however, the Project Site is not transected by known active or potentially active faults, and it is not located within an Alquist-Priolo Earthquake Fault Zone. Seismic-related hazards are addressed in Chapter 3.6, *Geology and Soils*, of this Draft SEIR.
City of Los Angeles Northeast Community Plan	
Objective 1-1: To preserve and enhance existing residential neighborhoods.	**No Conflict.** The Proposed Project would occur within the boundaries of the Project Site; no off-site development would occur. The Proposed Project would not substantially disrupt or physically divide existing residential neighborhoods located in the surrounding area. The Proposed Project would facilitate the connectivity between the Project Site and the established neighborhoods and communities that surround the Project Site. Additionally, the Proposed Project would include wellness and community benefit uses that would benefit the surrounding community. The Proposed Project would not conflict with this objective.
Objective 1-2: To allocate land for new housing to accommodate a growth of population that is consistent with and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and	**No Conflict.** The Proposed Project would result in new residential uses at the Project Site in a highly developed area that is currently served by existing infrastructure and public services, which would be appropriately replaced and resized as needed to meet the needs of the existing and proposed future uses. As discussed in Chapter 3.12, *Population and Housing*, the Proposed Project's residential population would fall within the assumptions anticipated for the City by SCAG for the year 2050; the Proposed Project would represent 2 percent of the projected population growth for the City of Los Angeles. The Proposed Project also includes educational uses, which would ensure adequate access to help meet community needs.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
government services, especially schools.	The proposed Master Plan "healthy village" concept and objectives of the Proposed Project would ensure all future uses associated with the Proposed Project would continue to support the health, safety, welfare, and convenience of the existing community and future users within the Project Site and in the surrounding area.
Objective 1-4: To preserve and enhance neighborhoods with a distinctive and significant historical or architectural character.	**No Conflict.** The Proposed Project would preserve the General Hospital Building. Specifically, the Proposed Project would result in the adaptive reuse of the General Hospital Building, which would include a portion of the Proposed Project's residential units. The units within the General Hospital Building would retain historic architectural features of the building. The Proposed Project would not conflict with this objective.
Objective 3-2: To provide existing and future industrial uses that contribute job opportunities for residents and minimize adverse environmental and visual impacts on the community.	**No Conflict.** The Proposed Project would add industrial uses and associated job opportunities to the Project Site. As discussed in Chapter 2 of this Draft SEIR, the Proposed Project would permit the following uses: light industrial, data centers, laboratories (research and testing), light manufacturing (artistic and artisanal goods, alcoholic beverages, cosmetic and pharmaceutical, food and drink, garment and accessory, general, and textile), and scientific research or experimental development of materials, methods or products. The proposed industrial uses would be in strategic locations, guided by the proposed regulatory framework, within the Project Site to minimize conflicts with the proposed residential uses on the Project Site and surrounding off-site areas. The proposed Master Plan includes a massing strategy and development standards to minimize impacts related to aesthetics. Specifically, the Master Plan intends to preserve viewsheds towards the General Hospital Building. The proposed industrial-related uses would not result in adverse environmental and visual impacts on the community. A discussion of the Proposed Project's impacts related to aesthetics is provided in Chapter 3.1, *Aesthetics*, of this Draft SEIR.
Objective 4-2: To preserve existing open space resources and, where possible encourage acquisition of new open space. **Objective 5-1:** To conserve, expand, maintain, and better utilize existing recreation	**No Conflict.** The Proposed Project would include landscaping and recreational facilities and amenities to encourage outdoor recreation, increase mobility, and facilitate access to and throughout the Project Site, expanding connectivity between the east and west parts of the Campus. As further discussed in Chapter 3.14, *Recreation*, the proposed landscaping and recreational facilities would be accessible to residents in the surrounding community. The Proposed Project would not conflict with this objective. Additionally, as shown in Table 3.14-1, *Parks and Recreational Facilities Within One Mile of Project Site*, there are 18 parks within one mile of the Project Site. The Proposed Project would not

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
and park facilities to address the recreational needs of the community.	remove existing recreational facilities nor would the Proposed Project interfere with access to these parks.
Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands.	**No Conflict.** A discussion of the Proposed Project's impacts related to public services is provided in Chapter 3.13, *Public Services*, of this Draft SEIR. Campus security and safety is currently provided by private security services and the County of Los Angeles Sheriff's Department (LASD) County Services Bureau (CSB) provides law enforcement at the Project Site. These services are supplemented by the City of Los Angeles Police Department Hollenbeck Station. The Proposed Project would be limited to the Project Site and would not expand the jurisdiction of the police facilities. Although the Proposed Project would introduce incremental growth that could incrementally increase demand for police protection services, the increase in demand on police protection services would occur within an existing urbanized area that is already served by established law enforcement providers and on-site private security services. As discussed in Chapter 3.13, *Public Services*, the increase in demand would not be substantial such that the construction of new or expanded police facilities would be required. The Proposed Project would not conflict with this objective.
Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.	**No Conflict**. A discussion of the Proposed Project's impacts related to fire protection services is provided in Chapter 3.13, *Public Services*, of this Draft SEIR. The Project Site is currently served by the City of Los Angeles Fire Department (LAFD). The Proposed Project would result in a new permanent residential population at the Project Site and would therefore incrementally increase demand for fire protection and emergency response services. However, the Proposed Project's residential population increase would fall within the population growth projections anticipated by SCAG for the City of Los Angeles and would occur within an existing urbanized area currently served by LAFD. As discussed in Chapter 3.13, the incremental increase in demand for fire protection services would not be substantial such that new or expanded fire facilities would be required. Additionally, the Proposed Project would not expand the service area of the LAFD. Therefore, Proposed Project would not conflict with this objective.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Objective 10-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with the Citywide performance standards for acceptable levels of service and ensure that necessary road access and street improvements are provided to accommodate traffic generate by new development.	**No Conflict.** The Proposed Project would include upgrades to the Project Site that would improve design features for visitors, employees, and future residents. These upgrades would include improved sidewalks and safe, pedestrian walking paths throughout the Project Site. Proposed Project improvements to access, wayfinding, and the general orientation of Project Site facilities would also improve safety for motorists, pedestrian, and bicyclists as they travel to and around the Project Site. As discussed in Chapter 3.15, *Transportation*, the Proposed Project would incorporate mitigation measures to mitigate traffic impacts for potential development under the Master Plan on the surrounding street system. The mitigation measures would provide the necessary street improvements to accommodate traffic generated by the Proposed Project. It should be noted that level of service is no longer a metric used to determine CEQA significance. Although LOS is no longer used to determine transportation impacts under CEQA, the County of Los Angeles has adopted VMT-based significance thresholds and transportation performance standards consistent with State CEQA Guidelines Section 15064.3. The Proposed Project has been evaluated using these current standards, and as discussed in Chapter 3.15, *Transportation*, implementation of applicable mitigation measures would ensure consistency with applicable City transportation performance standards. The Proposed Project would not conflict with this objective.
Objective 11-2: To increase the work trips and non-work trips made on public transit.	**No Conflict.** The Proposed Project would include new employment opportunities and residential uses to the Project Site; thereby placing residents in proximity to jobs and reducing work trips. Additionally, the Proposed Project would promote the use of transit as it would include the development of a mobility hub, which, once built, would serve local buses, and the Project Site is located within a half mile of a high-quality transit corridor and is located in proximity to public transit. The Proposed Project would not conflict with this objective.
Objective 14-1: To ensure that the plan area's significant cultural and historical resources are protected, preserved, and/or enhanced.	**No Conflict.** See discussion of Policies C/NR 13.1, C/NR 14.1 and C/NR 14.3.

Table 3.10-2 Proposed Project's Potential to Conflict with Land Use Plans, Policies, or Regulations

Policy/Objective Number	Potential to Conflict
Objective 14-3: To enhance and capitalize on the contribution of existing cultural and historical resources in the community.	

Sources: SCAG 2024; City of Los Angeles 1999; County of Los Angeles 2025a.

As shown in Table 3.10-2, the Proposed Project would be generally supportive of or consistent with the relevant policies and objectives in Connect SoCal 2024 and the adopted LA County General Plan 2035. Additionally, the Proposed Project would be generally supportive of or consistent with the relevant policies and objectives included in the City's Northeast Los Angeles Community Plan. As discussed throughout this Draft SEIR, while certain environmental impact areas may require mitigation to reduce potentially significant impacts, the Proposed Project would not conflict with the applicable plans, policies or objectives identified in Table 3.10-2. As discussed in other chapters of this Draft SEIR, the Proposed Project could result in potentially **significant** impacts without the implementation of mitigation.

As discussed in the regulatory setting of this chapter, the Adelante Eastside Redevelopment Plan, which will expire in March 2031, aimed to remove blight and preserve and increase employment, job, training, and business and investment opportunities through redevelopment programs. The Proposed Project would be generally supportive of the main goal of the Adelante Eastside Redevelopment Plan as the Proposed Project seeks to revitalize the Campus and introduce additional job opportunities and job training. The Proposed Project also includes opportunities for infill development, directing future housing growth to transit served areas and would provide tools to create more affordable housing. Therefore, the Proposed Project would be generally consistent with the Adelante Eastside Redevelopment Plan in terms of its broad goals and policies related to land use. The Proposed Project does not support carrying forward the Adelante Eastside Redevelopment Plan's design standards because the Proposed Project would regulated by the proposed Use and Development Standards.

Impact LU-1: Without mitigation the Proposed Project has the potential to conflict with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

> **Mitigation:** Implement Mitigation Measures CUL-1a through CUL-1c, Mitigation Measure CUL-2, Mitigation Measures GEO-1 through GEO-4, Mitigation Measure NOI-1,

Mitigation Measures NOI-1 through NOI-4, and Mitigation Measures TRA-1 through TRA-3.

Significance with Mitigation: Less than significant. As shown in Table 3.10-2, the Proposed Project would be generally supportive of and consistent with the relevant goals, polices, and objectives of Connect SoCal, LA County General Plan 2023, and City of Los Angeles Northeast Los Angeles Community Plan. As discussed throughout this Draft SEIR, the Proposed Project could result in potentially significant environmental impacts; however, mitigation measures would reduce impacts where feasible. Notwithstanding the identified environmental impacts, the Proposed Project would not conflict with the applicable plans, policies, and objectives evaluated in this section. Therefore, impacts would be **less than significant**.

3.10.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative land use and planning impacts is the County of Los Angeles. Although the Project Site is located within the City of Los Angeles, it is owned and operated by the County of Los Angeles, and the County has elected to illustrate compliance with its own planning and zoning regulations although the Project Site is not located in the unincorporated County. Accordingly, consistency and cumulative land use impacts are appropriately evaluated within the context of the County's General Plan and regulatory framework. Because cumulative land use impacts relate to potential conflicts with adopted plans and policies, the County of Los Angeles represents the appropriate geographic context for analysis. Cumulative land use impacts are policy-based rather than proximity-based; therefore, the relevant cumulative study area is defined by the jurisdiction responsible for land use regulation of the Project Site. The full list of 13 cumulative projects is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to land use?

DIVISION OF AN ESTABLISHED COMMUNITY

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the division of an established community during construction. Construction activities associated with the Proposed Project would be temporary and would not result in permanent roadway closures, new physical barriers, or changes to land use designations. Other related or reasonably foreseeable development projects within the cumulative study area would also be required to comply with applicable regulations governing construction practices and maintenance of access.

Therefore, the Proposed Project's temporary construction activities would not contribute to a cumulatively considerable impact related to the physical division of an established community or land use policy conflicts. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the division of an established community during operation. The Proposed Project would not include the closure or permanent modification of off-site rights-of-way that would result in the division of an established community. Therefore, when considered with other cumulative projects within the region, including the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), 2330 E 3rd Street (Cumulative Project 5), 443 S Soto Street (Cumulative Project 6), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Population 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13) (see Chapter 3*, Environmental Analysis*, for a description of each cumulative project), the Proposed Project would not contribute to a cumulatively considerable impact related to physically dividing an established community. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

CONFLICT WITH ANY APPLICABLE LAND USE PLANS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, adopted for the purpose of avoiding or mitigating an environmental effect during construction. Construction activities associated with the Proposed Project would be temporary and would not result in changes to land use designations. Therefore, the Proposed Project's temporary construction activities would not contribute to a cumulatively considerable impact related to land use policy conflicts. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, conflict with plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect during operation. The Proposed Project would result in construction activities adjacent to historic resources within the Project Site. Therefore, cumulative impacts could be **significant.**

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

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

Significance with Mitigation: Less than significant. The Proposed Project would incorporate mitigation measure to reduce impacts to the greatest extent feasible. As discussed throughout this Draft SEIR, cumulative impacts associated with the Proposed Project could be potentially significant in certain resource areas. Although mitigation measures would reduce cumulative impacts where feasible, some cumulative impacts may remain significant and unavoidable. Notwithstanding these impacts, the Proposed Project would not conflict with the applicable plans, policies, and objectives evaluated in this section. Therefore, the Proposed Project's cumulative impact related to plan consistency would be **less than significant**.

3.10.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.10.4, *Project Impact Analysis,* and 3.10.*5, Cumulative Impact Analysis*, the Proposed Project would result in no significant and unavoidable impacts related to land use and planning. The Proposed Project would result in similar impacts as those identified in the 2014 Master Plan EIR. The Proposed Project would result in less than significant impacts related to the physical division of an established community and less than significant impacts with mitigation incorporated related to conflicts with plans, policies, and regulations adopted for the purposes of mitigating environmental effects. Specifically, related to historic resources, the Proposed Project would incorporate mitigation measures to reduce impacts during construction on adjacent historic resources, such as historic buildings to remain on the Project Site.

As shown in Table 3.10-1, *Summary of the 2014 Master Plan EIR Land Use and Planning Impact Conclusions*, the 2014 Master Plan EIR concluded that the 2014 Master Plan was generally consistent with applicable local and regional plans, and impacts would be less than significant. With respect to consistency with the LA County General Plan 2035, the 2014 Master Plan EIR

only conducted a consistency analysis with the Land Use Element of that plan. This Draft SEIR evaluates consistency with all applicable policies from all elements of the LA County General Plan 2035 that are adopted for the purpose of avoiding or mitigating environmental effects.

3.10.7 References

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3.11 NOISE

This chapter of the Draft SEIR discusses the existing noise setting at the Project Site and surrounding area, including applicable regulating noise standards and thresholds. This chapter also identifies potential impacts related to noise and vibration from the implementation of the Proposed Project and, as necessary, recommend mitigation measures to avoid/reduce the significance of impacts. The analysis presented in this chapter also presents noise measurements conducted for the Proposed Project on November 3, 2025, November 4, 2025, and November 10, 2025.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, comments were received regarding noise and vibration impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*.

The analysis in this chapter is based in part on the noise modeling data included in Appendix I, *Noise Data*, of this Draft SEIR.

Terminology

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq})**; also called the Energy-Equivalent Noise Level. The value of an equivalent, steady sound level that, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the L_{eq} metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.
- **Statistical Sound Level (L_n).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as

the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

- **Day-Night Sound Level (L_{dn} or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the L_{dn} value). As a matter of practice, L_{dn} and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Peak Particle Velocity (PPV).** The peak signal value of an oscillating vibration velocity waveform usually expressed in inches per second (in/sec).
- **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.

NOISE AND VIBRATION FUNDAMENTALS

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness." Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

SOUND FUNDAMENTALS

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are "felt" more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is usually used to relate noise to human sensitivity. The dBA performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

NOISE FUNDAMENTALS

Noise intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, while 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation

period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_2, L_8, and L_{25} values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance for stationary noise sources with a city's noise ordinance, as discussed below. Other values typically noted during a noise survey are the L_{min} and L_{max}. These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dBA increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 am to 10:00 pm and 10 dBA for the hours from 10:00 pm to 7:00 am. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 pm and 10:00 pm. Both descriptors give roughly the same 24-hour level with the CNEL being only slightly more restrictive (i.e., higher).

SHIELDING BY NATURAL OR HUMAN-MADE FEATURES

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dBA of noise reduction. A higher barrier may provide as much as 20 dBA of noise reduction.

PSYCHOLOGICAL AND PHYSIOLOGICAL EFFECTS OF NOISE

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear. Figure 3.11-1, *Common Indoor*

and Outdoor Noise Levels, shows typical noise levels from familiar noise sources at a specified distance.

VIBRATION FUNDAMENTALS

Vibration is an oscillatory motion through a solid medium, such as the ground or a building. Vibration is normally associated with activities stemming from operations of railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers.

AMPLITUDE

Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square (RMS) velocity. PPV is the maximum instantaneous peak of the vibration signal, and RMS is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Persons accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 3.11-1, *Human Reaction to Typical Vibration Levels*, shows the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

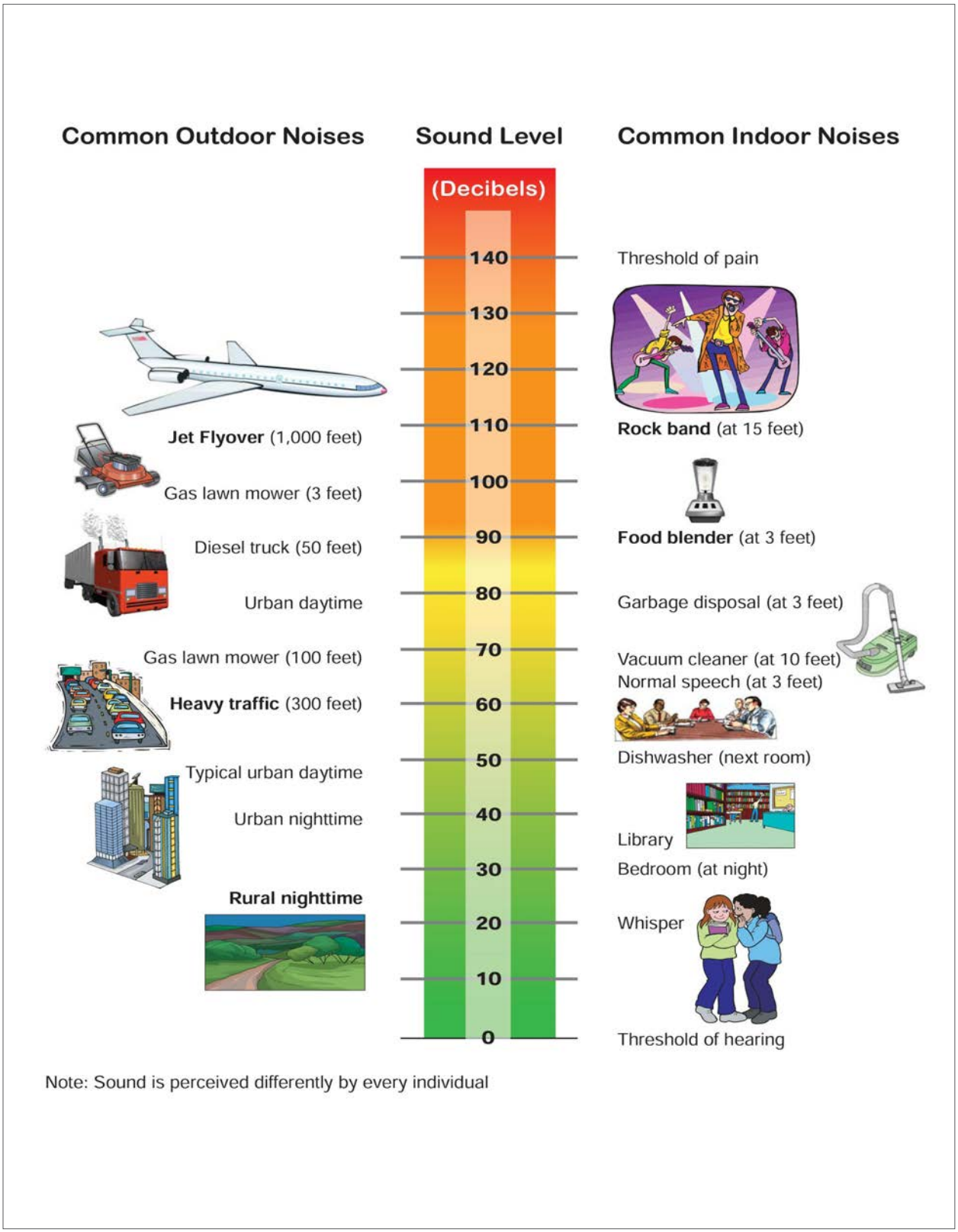
Table 3.11-1 Human Reaction to Typical Vibration Levels

Vibration Level (PPV)	Human Reaction	Effect on Buildings
0.006–0.019 in/sec	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08 in/sec	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10 in/sec	Level at which continuous vibration begins to annoy people	Virtually no risk of "architectural" (i.e., not structural) damage to normal buildings
0.20 in/sec	Vibrations annoying to people in buildings	Threshold at which there is a risk to "architectural" damage to normal dwellings – houses with plastered walls and ceilings

Source: Caltrans 2020.
Notes: in/sec = inches per second
PPV = peak particle velocity
Caltrans = California Department of Transportation.

Groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are heavy construction equipment (such as blasting and pile driving), steel-wheeled trains, and heavy trucks on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

Figure 3.11-1 - Common Indoor and Outdoor Noise Levels



Source: ADOT 2008.

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3.11.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Construction Noise and Vibration

The Federal Transit Administration (FTA) oversees safety measures related to noise and vibration. The FTA's Transit Noise and Vibration Impact Assessment manual indicates that 80 A-weighted decibels (dBA) equivalent sound level (L_{eq}) is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018). In the absence of local construction noise limits, the FTA recommended 80 dBA L_{eq} criteria is used to assess the significance of construction noise levels at residential receivers. In absence of a numeric threshold for building damage, the FTA thresholds of 0.2 peak particle velocity (PPV) for non-engineered and masonry buildings and 0.12 PPV for historical structures.

STATE

California Green Buildings Standards Code (CALGreen)

The California Green Building Standards Code (CALGreen) (California Code of Regulations, Title 24, Part 11) establishes mandatory measures for the design and construction of buildings to promote environmental sustainability and occupant health. In addition to addressing energy efficiency, water conservation, and material resource efficiency, CALGreen includes provisions intended to enhance interior environmental quality, which encompasses control of interior noise levels.

Specifically, Section 5.507 of CALGreen (for nonresidential buildings) and Section 4.507 (for residential buildings) set requirements to limit interior noise levels resulting from exterior sources. For example, CALGreen mandates that:

- Interior noise levels attributable to exterior noise sources shall not exceed 50 decibels (dBA) L_{eq} (1-hour) in occupied areas of nonresidential buildings, as determined in accordance with the California Building Code; and

- Projects located within airport noise exposure contours or near major transportation noise sources must incorporate sound-rated wall and window assemblies or other acoustical features to achieve the required interior noise reduction.

These requirements ensure that new buildings are designed to provide adequate acoustic insulation and maintain acceptable interior noise environments for building occupants. Compliance with CALGreen is verified through the building plan review and inspection process administered by local building departments.

Assembly Bill 1307

Signed into law on September 7, 2023, AB 1307 amends the California Environmental Quality Act (CEQA) and adds Public Resources Code (PRC) Section 21085. Pursuant to PRC Section 21085 for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment. Accordingly, the noise from residential development projects is limited to construction noise, noise from the operation of the house (e.g., heating, ventilation, and air conditioning equipment), and increases in transportation noise from vehicle trips generated from the residential project.

California Department of Transportation

Noise

Caltrans evaluates traffic noise for projects that involve State highway facilities using the Traffic Noise Analysis Protocol (TNAP 2020) and the accompanying Technical Noise Supplement (TeNS). Although the Proposed Project is not a Caltrans project and does not involve improvements to State highway facilities, Caltrans' exterior noise criteria provide a widely recognized benchmark for assessing roadway noise exposure, including the Los Angeles Unified School District (LAUSD), particularly where State routes or freeway-adjacent sensitive receptors are involved. Caltrans applies a 67 dBA L_{eq} exterior noise standard and a 45 dBA L_{eq} interior noise standard.

Vibration

Caltrans recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards. A conservative vibration limit of 0.25 to 0.30 in/sec PPV has been used for older buildings that are found to be structurally sound but cosmetic damage to plaster ceilings or walls is a major concern. For historic buildings or buildings that are documented to be structurally weakened, a conservative limit of 0.08 in/sec PPV is often used to provide the highest level of protection. All of these limits have been used successfully and compliance with these limits has not been known to result in appreciable structural damage. All vibration limits referred to herein apply on the ground level and take into account the response of structural elements (i.e., walls and floors) to groundborne excitation.

California Vehicle Code Section 27150

California Vehicle Code Section 27150 requires that all motor vehicles be equipped with a muffler in good working order and in constant operation to prevent excessive or unusual noise. The code prohibits the use of exhaust systems that have been modified in a manner that amplifies or increases noise emissions beyond that produced by a properly functioning muffler. These requirements establish a statewide baseline for exhaust noise control applicable to vehicles and equipment operating on public roadways and construction sites.

California Code of Regulations, Title 8

The California Code of Regulations, Title 8, administered by the Division of Occupational Safety and Health (Cal/OSHA), establishes safety standards for construction activities, including requirements that equipment and machinery be maintained in safe operating condition. These standards require that internal-combustion-engine powered equipment be properly maintained, including exhaust and air-intake systems, to protect worker safety and minimize hazards associated with equipment operation. Compliance with Title 8 requirements is standard practice for construction activities throughout California.

REGIONAL

There are no regional regulations related to noise that are applicable to the Proposed Project.

LOCAL

County of Los Angeles Code of Ordinances

Exterior noise standards are identified in Section 12.08.390 of the County of Los Angeles Code of Ordinances, as follows:

- Unless otherwise herein provided, the following exterior noise levels shall apply to all receptor properties within the designated noise zones (see Table 3.11-2, *County of Los Angeles Exterior Noise Level Standards*):

Table 3.11-2 County of Los Angeles Exterior Noise Level Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)
I	Noise-sensitive area	Anytime	45
II	Residential properties	10:00 pm to 7:00 am (nighttime)	45
		7:00 am to 10:00 pm (daytime)	50
III	Commercial properties	10:00 pm to 7:00 am (nighttime)	55
		7:00 am to 10:00 pm (daytime)	60
IV	Industrial properties	Anytime	70

Notes: dB= decibel

Interior noise standards are identified in Section 12.08.400, as follows:

- No person shall operate or cause to be operated within a dwelling unit, any source of sound, or allow the creation of any noise, which causes the noise level when measured inside a neighboring receiving dwelling unit to exceed the following standards:
  - Standard No. 1: The applicable interior noise level for cumulative period of more than five minutes in any hour; or
  - Standard No. 2: The applicable interior noise level plus 5 dB for a cumulative period of more than one minute in any hour; or
  - Standard No. 3: The applicable interior noise level plus 10 dB or the maximum measured ambient noise level for any period of time.
- The following interior noise levels for multifamily residential dwelling units shall apply, unless otherwise specifically indicated, within all such dwelling units with window in their normal seasonal configuration (see Table 3.11-3, *County of Los Angeles Interior Noise Level Standards*).

Table 3.11-3 County of Los Angeles Interior Noise Level Standards

Noise Zone	Designated Land Use	Time Interval	Allowable Interior Noise Level (dB)
All	Multifamily	10:00 pm – 7:00 am	40
	Residential	7:00 am – 10:00 pm	45

- If the measured ambient noise level reflected by the L_{50} exceeds that permissible within any of the interior noise standards in subsection A of Section 12.08.390 of the County of Los Angeles Code of Ordinances, the allowable interior noise level shall be increased in 5 dB increment in each standard as appropriate to reflect said ambient noise level (L_{50})

Construction noise is addressed in Section 12.08.440 of the County of Los Angeles Code of Ordinances, as follows:

- Operating or causing the operation of any tools or equipment used in construction, drilling repair, alteration or demolition work between weekday hours of 7:00 pm and 7:00 am, or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service or by variance issued by the health office is prohibited.
- **Noise Restrictions at Affected Structures.** The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in the following schedule:
  - At Residential Structures.
    - **Mobile Equipment.** Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment (see Table 3.11-4, *County of Los Angeles Maximum Noise Levels – Mobile Equipment*):
  - **Stationary Equipment.** Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment (see Table 3.11-5, *County of Los Angeles Maximum Noise Levels – Stationary Equipment*):
  - At Business Structures
    - **Mobile equipment.** Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment:
      - Daily, including Sunday and legal holidays, all hours: maximum of 85 dBA
- All mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order.
- In case of a conflict between this chapter (Chapter 12.08 of the County of Los Angeles Code of Ordinances) and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

Table 3.11-4 County of Los Angeles Maximum Noise Levels – Mobile Equipment

	Single-family Residential	Multi-family Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 am to 8:00 pm	75 dBA	80 dBA	85 dBA
Daily, 8:00 pm to 7:00 am and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

Note: dBA= A-weighted decibel

Table 3.11-5 County of Los Angeles Maximum Noise Levels – Stationary Equipment

	Single-family Residential	Multi-family Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 am to 8:00 pm	60 dBA	65 dBA	70 dBA
Daily, 8:00 pm to 7:00 am and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Note: dBA= A-weighted decibel

The County of Los Angeles Code of Ordinances also includes the following standard, in Section 12.08.560, related to groundborne vibration:

Operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The perception threshold shall be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.

Additionally, Section 12.08.570 identifies exemptions from the restrictions of Chapter 12.08 of the County of Los Angeles Code of Ordinances. The exemptions that are applicable to the Proposed Project include:

- **Emergency Exemption.** The emission of sound for the purpose of alerting persons to the existence of an emergency, or the emission of sound in the performance of emergency work;
- **Warning Devices.** Warning devices necessary for the protection of public safety, as for example, police, fire and ambulance sirens, and train horns;
- **Outdoor Activities.** Activities conducted on public playgrounds and public or private school grounds, including but not limited to school athletic and school entertainment events;
- **Exemption from Exterior Noise Standards.** The following activities are exclusively regulated by the prohibitions of Part 4 of this chapter (Chapter 12.08 of the County of Los Angeles Code of Ordinances):
  - Construction;
  - Stationary nonemergency signaling devices;
  - Emergency signaling devices;
  - Refuse collection vehicles;
  - Residential air-conditioning or refrigeration equipment,
  - Forced-air blowers;

- **Public Health and Safety Activities.** All transportation, flood control, and utility company maintenance and construction operations at any time on public right-of-way, and those situations which may occur on private real property deemed necessary to serve the best interest of the public and to protect the public's health and well-being, including but not limited to street sweeping, debris and limb removal, removal of downed wires, restoring electrical service, repairing traffic signals, unplugging sewers, snow removal, house moving, vacuuming catch basins, removal of damaged poles and vehicles, repair of water hydrants and mains, gas lines, oil lines, sewers, etc.;
- **Motor Vehicles on Private Right-of-way and Private Property.** Except as provided in Section 12.08.550, all legal vehicles of transportation operating in a legal manner in accordance with local, state and federal vehicle-noise regulations within the public right-of-way or air space, or on private property;
- **Minor Maintenance to Residential Real Property.** Noise sources associated with the minor maintenance of residential real property, provided said activities take place as follows:
  - During Pacific Standard Time between the hours of 8:00 am and 6:00 pm on any day except Sunday, when such activities may take place between the hours of 9:00 am and 6:00 pm, and
  - During Daylight Savings Time between the hours of 8:00 am and 7:00 pm on any day except Sunday, when such activities may take place between the hours of 9:00 am and 6:00 pm

The County of Los Angeles Code of Ordinances also includes the following standard, in Section 12.08.580, related to variances:

- Variances from the requirements of this chapter may be granted by the health officer for a period of not to exceed two years, subject to such terms, conditions and requirements as he may deem reasonable. A variance may be granted only if the health officer makes the findings that:
  - Additional time is necessary for the applicant to alter or modify his activity, operation or noise source to comply with this chapter; or
  - The activity, operation or noise source cannot feasibly be done in a manner that would comply with the provisions of this chapter, and no other reasonable alternative is available to the applicant.
- In granting a variance, the health officer may prescribe any conditions or requirements he deems necessary to minimize adverse effects upon the community or the surrounding neighborhood.
- In granting variances, the health officer shall consider the magnitude of nuisance caused by the offensive noise, the uses of property within the area of impingement by the noise, operations carried on under existing nonconforming rights or conditional use permits or zone variances, the time factors related to study, design, financing and construction of

remedial work, the economic factors related to age and useful life of the equipment, the general public interest, health and welfare, the feasibility of plans submitted for correction, and the effect on the community if the variance was refused.

County of Los Angeles General Plan

The Noise Element of County of Los Angeles General Plan 2035 (LA County General Plan 2035) provides a number of policies related to noise including (County of Los Angeles 2015):

- **Policy N.1.1.** Utilize land uses to buffer noise-sensitive uses for sources of adverse noise impacts
- **Policy N 1.2.** Reduce noise exposure to noise impacts by promoting land use compatibility.
- **Policy N 1.3.** Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).
- **Policy N 1.5.** Ensure compliance with the jurisdiction of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or Ldn) noise exposure contours.
- **Policy N 1.6.** Ensure cumulative impacts related to noise do not exceed health-based safety margins.
- **Policy N 1.7.** Utilize traffic management and noise suppression techniques to minimize noise traffic and transportation systems.
- **Policy N 1.9.** Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 dBA CNEL and above, when unavoidable impacts are identified.
- **Policy N 1.10.** Orient residential units away from major noise sources (in conjunction with applicable building codes).
- **Policy N 1.11.** Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/light industrial uses.
- **Policy N 1.12.** Decisions on land adjacent to transportation facilities, such as the airports, freeways, and other major highways, must consider both existing and future noise level of these transportation facilities to assure the compatibility of proposed uses.

City of Los Angeles Municipal Code

Section 41.40(a) of the City of Los Angeles Municipal Code states the following (City of Los Angeles 2025):

> "No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code."

Additionally, Section 41.40(c) states the following (City of Los Angeles 2025):

> "No person, other than an individual homeowner engaged in the repair or construction of the homeowner's single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specified. The provisions of this subsection shall not apply to persons engaged in the emergency repair of:
>
> 1. Any building or structure.
> 2. Earth supporting or endangering any building or structure.
> 3. Any public utility.
> 4. Any public way or adjacent earth."

Section 112.05 of the City of Los Angeles Municipal Code also places maximum noise levels of powered equipment or powered hand tools as follows (City of Los Angeles 2025):

> "Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:
>
> a) 75 dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers,

compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

b) 75 dB(A) for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

c) 65 dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors;

The noise limits for particular equipment listed above in (a), (b) and (c) shall be deemed to be superseded and replaced by noise limits for such equipment from and after their establishment by final regulations adopted by the Federal Environmental Protection Agency and published in the Federal Register.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment."

Chapter XI, "Noise Regulations," of the City of Los Angeles Municipal Code regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment, or residential activities. It is noted that while these regulations do not apply to vehicles operating on public rights-of-way, they do apply to noise generated by vehicles on private property such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. Section 111.01 (a) of the City of Los Angeles Municipal Code defines the ambient noise as "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes…" Section 111.03 of the City of Los Angeles Municipal Code identifies minimum ambient noise levels as follows (City of Los Angeles 2025):

> Where the ambient noise level is less than the presumed ambient noise level designated in this section, the presumed ambient noise level in this section shall be deemed to be the minimum ambient noise level for purposes of this chapter.

Section 112.02 of Chapter XI addresses noise from air conditioning, refrigeration, heating, pumping, and filtering equipment. It states that such equipment may not generate noise that would exceed the ambient noise level at any adjacent property by more than 5 dBA.

City of Los Angeles noise standards are shown in Table 4.11-6, *City of Los Angeles Ambient Noise Level Standards*.

Table 3.11-6 City of Los Angeles Ambient Noise Level Standards

Zone	Presumed Ambient Noise Level (dBA)	
	Day	Night
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50	40
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
M1, MR1, and MR2	60	55
M2 and M3	65	65

Source: City of Los Angeles 2025

Note: At the boundary line between two zones, the presumed ambient noise level of the quieter zone shall be used.

City of Los Angeles General Plan

The Noise Element of the City of Los Angeles General Plan (General Plan) was adopted in 1999 by the City of Los Angeles City Council. The Noise Element contains the following policy that is relevant to the Proposed Project (City of Los Angeles 1999):

- **Policy 5.** Continue to enforce, as applicable, city, state, and federal regulations intended to abate or eliminate disturbances of the peace and other intrusive noise.
- **Policy 6.** When processing building permits, continue to require appropriate project design and/or insulation measures, in accordance with the California Noise Insulation Standards (Building Code Title 24, Section 3501 et seq.), or any amendments thereto or subsequent related regulations, so as to assure that interior noise levels will not exceed the minimum ambient noise levels, as set forth in the city's noise ordinance (LAMC Section 111 et seq., and any other insulation related code standards or requirements) for a particular zone or noise---sensitive use, as defined by the California Noise Insulation Standards.
- **Policy 11.** For a proposed development project that is deemed to have a potentially significant noise impact on noise---sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.
- **Policy 12.** When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act.

City of Los Angeles CEQA Threshold Guide

According to the City of Los Angeles CEQA Threshold Guide, and as shown in Table 3.11-7, *City of Los Angeles Operational Noise Increase Significance Threshold*, "a project would normally have a significant impact on noise level from project operation if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL or within the 'normally unacceptable' or 'clearly unacceptable' category, or any 5 dBA or greater noise increase (City of Los Angeles 2005).

Table 3.11-7 City of Los Angeles Operational Noise Increase Significance Threshold

Land Use	Community Noise Exposure (CNEL dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Acceptable	Clearly Unacceptable
Single Family, Duplex, Mobile Homes	50-60	55-70	70-75	Above 70
Multi-Family Homes	60-65	60-70	70-75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-70	60-70	70-80	Above 80
Transient Lodging – Model, Hotels	50-65	60-70	70-80	Above 80
Auditoriums, Concert Halls, Amphitheaters	-	50-70	-	Above 65
Sports Area, Outdoor Spectator Sport	-	50-75	-	Above 70
Playgrounds, Neighborhood Parks	50-70	-	67-75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-75	-	70-80	Above 80
Office Buildings, Business and Professional Commercial	50-70	67-77	Above 75	-
Industrial, Manufacturing, Utilities, Agriculture	50-75	70-80	Above 75	-

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of Los Angeles 2005

City of Los Angeles Noise and Vibration Updates to Thresholds and Methodology

The City of Los Angeles Noise and Vibration Updates to the CEQA Thresholds and Methodology (City Noise Thresholds) (August 2024) are summarized here for informational purposes. The County thresholds used in this analysis are more conservative than the City of Los Angeles construction noise thresholds, as such, use of the County thresholds provides a more protective and conservative basis for evaluating potential construction noise impacts. This analysis retains the use of the Los Angeles County construction noise thresholds and the impact analysis in this Draft SEIR applies the Los Angeles County construction noise thresholds as the lead agency and owner of the Project Site. The use of these thresholds ensures that the evaluation of construction noise impacts is both conservative and consistent with the County's regulatory framework for County-owned facilities. The City Noise Thresholds are intended to be suited to the generally urban nature of the City, while still recognizing the importance of human health, including sleep disruption. The thresholds are intended to account for reasonable expectations regarding construction noise and vibration during daytime and nighttime hours, and also include absolute maximum noise levels that are intended to protect human health. These thresholds have been established based on input from Technical Advisory Committee noise experts, as well as a review of noise thresholds used by other State and local agencies (City of Los Angeles 2024).

Daytime Construction Noise Thresholds

Increase Over Ambient

- For construction activities that occur between 7:00 am and 7:00 pm Monday through Friday, and between 8:00 am and 6:00 pm on Saturdays, there is no numerical threshold above ambient noise levels.
- Construction noise would be limited to a maximum absolute noise threshold of 80 dBA $L_{eq(8\text{-}hour)}$ at noise sensitive uses. With respect to ambient noise, the 80 dBA $L_{eq(8\text{-}hour)}$ absolute threshold would be similar to a noise increase of approximately 10 dBA (based on an existing 70 dBA ambient noise level, a typical noise level along major roadways) to 25 dBA (based on an existing 55 dBA ambient noise level, a typical noise level in a quieter residential neighborhood) over the ambient noise level.

Absolute Thresholds

- On- and off-site construction noise during daytime hours (7:00 am and 7:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturdays) are limited to a maximum 80 dBA $L_{eq(8\text{-}hour)}$ absolute threshold at sensitive uses (at the property line or at the exterior of the building), including outdoor public recreational areas owned or maintained by a public agency. This standard does not apply to private residential balconies which may or may not extend past the exterior of a building, or to private residential recreational areas.

Nighttime Construction Noise Thresholds

Increase Over Ambient

- For construction activities that occur between 7:00 pm and 7:00 am Monday through Friday, and between 6:00 pm and 8:00 am on Saturdays, and anytime on Sundays or national holidays, noise levels at sensitive uses would not exceed 5 dBA above the ambient noise level at the receptor.
- Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.

Absolute Thresholds

- For construction activities that occur between 7:00 pm and 7:00 am Monday through Friday, and between 6:00 pm and 8:00 am on Saturdays, and anytime on Sundays or national holidays, the maximum exterior noise level at sensitive uses where sleep is expected will not exceed the following:
  - 55 dBA L_{eq} for sensitive uses within older buildings that would have operable windows that may be open.
  - 65 dBA L_{eq} for sensitive uses with windows closed that are not operable and are single-glazed.
  - 70 dBA L_{eq} for sensitive uses that have newer construction (i.e., the structures have been designed to ensure that an interior 45 dBA is obtained with double-paned windows)
- Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.

Vibration Thresholds for Human Annoyance

- For construction activities that occur between 7:00 am and 7:00 pm Monday through Friday, and between 8:00 am and 6:00 pm on Saturdays, there is no numerical threshold related to human annoyance.
- During nighttime hours (between 7:00 pm and 7:00 am Monday through Friday, and between 6:00pm and 8:00 am on Saturdays), and anytime on Sundays or national holidays, construction activities shall not generate groundborne vibration levels that exceed 80 VdB at the exterior of a sensitive use building.

Vibration Thresholds for Building Damage

- Architectural Building Damage—Construction activities shall not exceed the following building damage thresholds for the identified structures:

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older[1] Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

3.11.2 Existing Conditions

EXISTING NOISE ENVIRONMENT

The primary source of noise that currently occurs at the Project Site and the vicinity of the Project Site is from traffic on the surrounding streets and Interstate 5 (I-5) and 10 (I-10) freeways. Existing noise levels generated by these roadways are estimated as part of the analyses provided in Section 3.11.5, *Project Impact Analysis*, of this chapter. Secondary sources of noise include operations at nearby commercial and industrial properties, freight trains on the Union Pacific railroad north of the Campus, Metrolink Commuter line south of the Campus, existing operations at the Campus (including mechanical and utility plant equipment, parking lots and structures, ambulance sirens, ongoing construction activities associated with Restorative Care Village (RCV) Phase IV, aircraft overflights and occasional heliport operations for air ambulances), and day-to-day neighborhood noise (i.e., landscaping activities, barking dogs, etc.). The nearest airport to the Campus is the San Gabriel Valley Airport located approximately 10 miles northeast. Helipads that are used for emergency hospital uses are located within the Project Site. Emergency vehicles access the Project Site (specifically, the Medical Center) at 1983 Marengo Street.

SENSITIVE NOISE RECEPTORS

Consistent with commonly accepted CEQA noise analysis practices, a screening distance of approximately 500-feet from active construction areas is generally used to identify potentially noise-sensitive receptors. Noise-sensitive receptors located within approximately 500 feet of anticipated construction activities were identified and evaluated as part of the construction noise impact analysis. The Bravo Medical Magnet School receptor located beyond this distance was also considered to address comments raised by LAUSD during the scoping period.
The noise-sensitive receptors listed below and shown in Figure 3.11-2, *Noise Sensitive Land Uses,* represent the nearest off-site noise-sensitive receptors in each direction of the Project Site. These receptors are not intended to represent an exhaustive list of all sensitive receptors in the surrounding area but are intended to identify those that could experience highest noise

[1] Caltrans does not specify the age of the building to be considered. For vibration impact analyses, a building over 50 years old can be considered an "older" residential structure.

levels during construction and operation. In addition, on-site noise sensitive receptors, such as patients at the Medical Center and Restorative Care Village (RCV), are also addressed in this analysis. Representative nearest off-site noise-sensitive receptors, as measured from the nearest boundary of the Project Site, include the following list:

- Residences (multi- and single-family) located around 1106 Chicago Street, approximately 40 feet east of the main campus across Chicago Street.
- Residences (multi-family) located around 1709 Sichel Street, approximately 210 feet northwest of main campus across Mission Road shielded by existing structures.
- Place of worship (Saint Camillus Center for Spiritual Care) located at 1911 Zonal Avenue, approximately 60 feet north of the main campus across Zonal Avenue.
- Hazard Park and Recreation Center located at 2230 Norfolk Street, approximately 230 feet around east of the main campus across Zonal Avenue and San Pablo Street.
- An occupational center school (East Los Angeles Occupational Center) located approximately 312 feet at 2100 Marengo Street, south of the main campus, across Marengo Street.
- Bravo Medical Magnet School, located at 1200 Cornwell Street, approximately 750 feet southeast of the main campus and the intervening hill, across Cummings Street and Cornwell Street.

AMBIENT NOISE MEASUREMENTS

To present current observed noise conditions on and in the vicinity of the Project Site, thirteen short-term (ST) (15-minute) measurement locations and one long-term (LT) noise monitoring location were conducted (see Figure 3.11-3, *Noise Measurement Locations*).

Short-Term

Short-term (ST) measurements ST-1 through ST-8 and ST-10 through ST-13 were conducted on Monday, November 3, 2025, and one ST measurement, ST-9, was conducted on Monday, November 10, 2025 in the morning and afternoon hours. The sound level meter (Larson Davis LxT) used for noise monitoring satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation[2]. The sound level meter was set to “slow” response and “A” weighting (dBA). The sound level meter was calibrated prior to and after each monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Short-term measurement locations are described below, and results are summarized in Table 3.11-8, *Short-Term Noise Measurements Summary in A-Weighted Sound Levels*.

Table 3.11-8 Short-Term Noise Measurements Summary in A-Weighted Sound Levels

Monitoring Location	Description	15-minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L_{50}	L_{25}	L_{8}	L_{2}
ST-1	At the southwest corner of 3103 Main Street	71.2	80.7	48.9	69.5	72.8	75.7	77.5
ST-2	1028 Clement Street	49.6	52.6	50.8	51.1	51.3	52.5	52.5
ST-3	2042 Marengo Street	67.7	82.2	54.5	65.0	68.2	71.6	75.0
ST-4	East of 1110 Chicago Street	65.1	84.7	60.5	62.2	63.6	65.5	72.1
ST-5	South of 2093 Charlotte Street	61.1	75.1	54.2	57.9	60.5	64.9	69.2
ST-6	At the southeast corner of N Soto Street and Lancaster Avenue	71.8	83.4	52.6	69.5	73.2	75.9	78.4
ST-7	1035 Lord Street	60.8	77.9	47.8	56.1	57.7	62.6	70.5
ST-8	1024 Mark Street	64.3	83.3	51.7	57.6	59.8	64.4	74.7
ST-9	Courtyard at LA General Medical Center at 1200 N State Street	66.4	82.1	58.2	59.4	61.0	69.5	77.9
ST-10	At the southwestern end of Hazard Park	56.4	70.9	51.2	54.6	55.8	57.7	64.2
ST-11	Courtyard of the Imagining Science Center at 1774 Zonal Avenue	51.4	69.4	46.4	50.0	51.4	54.0	56.7
ST-12	On the north side of Charlotte Street, across LAUSD District office at 2310 Charlotte Street	64.3	80.0	53.8	59.7	65.4	68.8	71.1
ST-13	Coroner Road next to 1700 Zonal Avenue	62.2	78.6	51.0	56.4	59.3	66.8	72.2

Source: PlaceWorks 2025. See Appendix I, *Noise Data*.

- **Short-Term Location 1 (ST-1)** was conducted at the north-eastern corner of the Hancock Street and Main Street intersection, south of 3103 N Main Street approximately 0.3 miles northeast of the Project Site. A 15-minute noise measurement began at 10:27 am on Monday, November 3, 2025. The noise environment is characterized by traffic noise on Main Street and residential noises such as dogs barking, and bird noises. Average noise levels measured 71.2 dBA L_{eq} with a maximum of 80.7 dBA L_{max} during the measurement period at ST-1.
- **Short-Term Location 2 (ST-2)** was conducted on the sidewalk on Clement Street next to an apartment building at 1028 Clement Street, approximately 240 feet south of the Project Site, across Marengo Street. A 15-minute noise measurement began at 1:18 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic on Marengo Street and residential activities on Clement Street. The occasional helicopter would pass overhead and ambulances would periodically drive past on Marengo Street. Average noise

levels measured 49.6 dBA L_{eq} with a maximum of 52.6 dBA L_{max} during the measurement period at ST-2.

- **Short-Term Location 3 (ST-3)** was conducted on the sidewalk of Marengo Street to the east of a restaurant at 2042 Marengo Street, approximately 100 feet south of the Project Site. A 15-minute noise measurement began at 1:48 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic on Marengo Street and activity from the outdoor patio of the restaurant. The occasional helicopter would pass overhead and ambulances would periodically drive past on Marengo Street. Average noise levels measured 67.7 dBA L_{eq} with a maximum of 82.2 dBA L_{max} during the measurement period at ST-3.
- **Short-Term Location 4 (ST-4)** was conducted at the southern end of Chicago Street west of 1110 Chicago Street, approximately 60 feet southeast of the Project Site. A 15-minute noise measurement began at 2:09 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic noise on Chicago Street and Marengo Street, delivery trucks, and mechanical equipment noise. Average noise levels measured 65.1 dBA L_{eq} and 84.7 dBA L_{max} during the measurement period at ST-4.
- **Short-Term Location 5 (ST-5)** was conducted on the sidewalk at the Cummings Street/Charlotte Street and Chicago Street intersection, south of 2093 Charlotte Street, approximately 50 feet northeast of the Project Site. A 15-minute noise measurement began at 1:18 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic noise, delivery trucks, and helicopter and plane flyovers. Average noise levels measured 61.1 dBA L_{eq} with a maximum of 75.1 dBA L_{max} during the measurement period at ST-5.
- **Short-Term Location 6 (ST-6)** was conducted on a sidewalk at the southeast corner of Soto Street and Lancaster Avenue approximately 0.3 miles northeast of the Project Site. A 15-minute noise measurement began at 11:21 am on Monday, November 3, 2025. The noise environment is characterized primarily by traffic noise, and garbage pickup. Average noise levels measured 71.8 dBA L_{eq} with a maximum 83.4 dBA L_{max} during the measurement period at ST-6.
- **Short-Term Location 7 (ST-7)** was conducted on the sidewalk on Lord Street next to a single-family residence at 1035 Lord Street, approximately 185 feet south of the Project Site, across Marengo Street. A 15-minute noise measurement began at 12:03 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic on Marengo Street and Lord Street, and residential activities. The occasional helicopter would pass overhead and ambulances would periodically drive past on Marengo Street. Average noise levels measured 60.8 dBA L_{eq} with a maximum of 77.9 dBA L_{max} during the measurement period at ST-7.

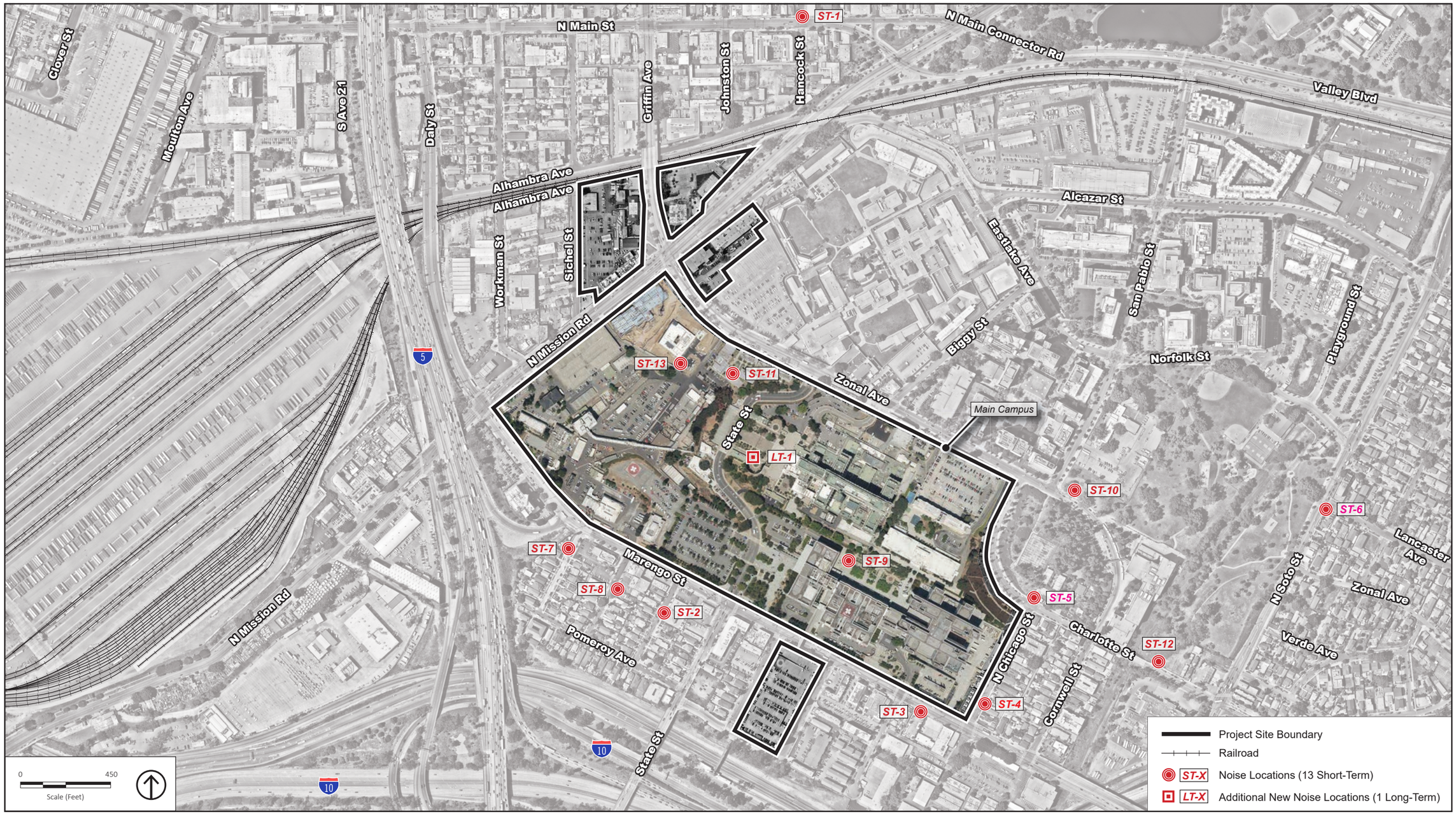
Figure 3.11-2 - Noise Sensitive Land Uses



Source: PlaceWorks 2026; Mead& Hunt 2010; City of Los Angeles 2025.

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3.11-3 - Noise Measurement Locations



Source: Nearmap 2025.

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- **Short-Term Location 8 (ST-8)** was conducted on the sidewalk on Mark Street next to a parking lot at 1024 Mark Street, approximately 200 feet south of the Project Site, across Marengo Street. Across Mark Street to the west is a fast food restaurant with drive-thru (McDonald's). A 15-minute noise measurement began at 12:26 pm on Monday, November 3, 2025. The noise environment is characterized primarily by traffic on Marengo Street and Lord Street, and activity in the fast food restaurant parking lot and drive-thru. The occasional helicopter would pass overhead and ambulances would periodically drive past on Marengo Street. Average noise levels measured 64.3 dBA L_{eq} with a maximum of 83.3 dBA L_{max} during the measurement period at ST-8.
- **Short-Term Location 9 (ST-9)** was conducted within the Project Site in the courtyard of the active LA General Medical Center at 1200 N State Street. A 15-minute noise measurement began at 7:30 am on Monday, November 10, 2025. The noise environment is characterized primarily by humming from hospital machinery, activity at the operating hospital, and landscaping activities. Average noise levels measured 66.4 dBA L_{eq} with a maximum of 82.1 dBA L_{max} during the measurement period at ST-9.
- **Short-Term Location 10 (ST-10)** was conducted on the southwestern portion of Hazard Park and Recreation Center, south of Legacy LA Youth Development's parking lot, approximately 310 feet east of the Project Site. A 15-minute noise measurement began at 11:53 am on Monday, November 3, 2025. The noise environment is characterized primarily traffic on Cornwell Street, the Bravo Medical Magnet High School public address system, and distant train horns. Average noise levels measured 56.4 dBA L_{eq} with a maximum of 70.9 dBA L_{max} during the measurement period at ST-10.
- **Short-Term Location 11 (ST-11)** was conducted in the courtyard of the Imagining Science Center at 1774 Zonal Avenue on the Project Site. A 15-minute noise measurement began at 9:29 am on Monday, November 3, 2025. The noise environment is characterized primarily by traffic on Zonal Avenue and activity from staff and patients on-site. Average noise levels measured 51.4 dBA L_{eq} with a maximum of 69.4 dBA L_{max} during the measurement period at ST-11.
- **Short-Term Location 12 (ST-12)** was conducted on a sidewalk on the north side of Charlotte Street, across LAUSD District office at 2310 Charlotte Street approximately 0.1 miles southeast of the Project Site. A 15-minute noise measurement began at 1:47 pm on Monday, November 3, 2025. The noise environment is characterized primarily by vehicle traffic on Charlotte streets, and the Interstate-10 freeway traffic noise. Average noise levels measured 64.3 dBA L_{eq} with a maximum of 80.0 dBA L_{max} during the measurement period at ST-12.
- **Short-Term Location 13 (ST-13)** was conducted on the sidewalk at Coroner Road, near active construction at the former Women's and Children's Hospital site within the boundaries of the Project Site. A 15-minute noise measurement began at 10:42 am on Monday, November 3, 2025. The noise environment is characterized primarily by construction activities, traffic

noise from Parking Lot 10, and employee activity. Average noise levels measured 62.2 dBA L_{eq} with a maximum of 78.6 dBA L_{max} during the measurement period at ST-13.

Long-Term

Ambient noise monitoring at LT-1 was conducted over a 24-hour period from November 3 to November 4, 2025 at the western front plaza of the General Hospital Building (see Figure 3.11-2). The measurement location was 165 feet west of the Division of Neonatal Medicine along State Street, and approximately 180 feet east of the historical main entrance to the General Hospital Building. The front plaza contains ornamental fencing and landscaping with public benches and tables. In addition, there is a fire lane utilized as a pick-up/ drop-off area at the western edge of the plaza. The noise environment is characterized primarily by traffic noise on State Street, mechanical noise (Heating, Ventilation, Air Conditioning [HVAC]), pedestrian noise (i.e., talking), birds and wind.

As previously identified, emergency vehicles access the Medical Center at a dedicated ambulance drop-off area is at 1983 Marengo Street. Ambulances may access the Project Site from surrounding streets such as Marengo Street or Zonal Avenue and then travel along State Street to reach the Medical Center. Under the California Vehicle Code (Sections 21055 and 21056) emergency vehicle sirens are used to warn surrounding traffic and request right-of-way during emergency response. Once emergency vehicles enter controlled hospital property or approach the destination where traffic clearing is no longer necessary, siren use is typically discontinued.

A Picollo II meter was used for the long-term noise measurement which satisfies the American National Standards Institute (ANSI) standard for Type II instrumentation. The meter was calibrated before and after the monitoring period. The long-term measurement was approximately 5 feet above the ground. Long-term measurement results are detailed below and summarized in Table 3.11-9, *Long-Term Noise Measurement Data*.

Table 3.11-9 Long-Term Noise Measurement Data

November 3-4, 2025 – 59.3 dBA CNEL									
Time	L_{eq} (dBA)	L_{max} (dBA)	L_{50} (dBA)	L_{90} (dBA)	Time	L_{eq} (dBA)	L_{max} (dBA)	L_{50} (dBA)	L_{90} (dBA)
12:00 PM	55.3	80.6	51.0	48.5	12:00 AM	50.4	62.8	49.6	46.8
1:00 PM	57.4	74.7	49.8	47.1	1:00 AM	48.0	61.7	47.1	45.5
2:00 PM	50.4	66.7	48.9	47.1	2:00 AM	46.5	62.4	45.1	44.1
3:00 PM	54.3	71.1	52.1	50.1	3:00 AM	46.5	55.8	45.7	44.0
4:00 PM	53.0	73.4	50.9	49.5	4:00 AM	49.1	64.9	48.0	47.0
5:00 PM	51.7	67.8	50.2	48.5	5:00 AM	50.6	65.9	49.8	48.5
6:00 PM	53.8	73.2	50.2	48.4	6:00 AM	50.5	67.7	48.0	46.5
7:00 PM	52.0	63.3	51.6	50.5	7:00 AM	50.7	65.9	49.1	47.2
8:00 PM	51.3	67.3	49.8	48.8	8:00 AM	64.0	76.8	52.9	47.9
9:00 PM	51.9	67.8	50.2	48.8	9:00 AM	50.8	66.3	49.8	47.3
10:00 PM	57.0	73.1	50.7	48.5	10:00 AM	49.4	62.0	48.0	46.9
11:00 PM	55.3	73.3	52.5	50.5	11:00 AM	55.9	68.5	53.1	49.3

Source: PlaceWorks, November 3 and November 4, 2025. See Appendix I, *Noise Data*.

The average daily noise level was calculated to be 59.3 dBA CNEL during the measurement period. Daytime (7:00 am to 7:00 pm) average noise levels measured 56.3 dBA L_{eq} with a maximum noise level of 70.6 dBA L_{max}; evening (7:00 pm to 10:00 pm) average noise level measured 51.7 dBA L_{eq} with a maximum noise level of 66.1 dBA L_{max}; and nighttime (10:00 pm to 7:00 am) average noise levels measured 52.0 dBA L_{eq} with a maximum of 65.3 dBA L_{max} during the continuous 24-hour continuous measurement period. Hourly noise monitoring data and average daily noise levels are shown in Appendix I, *Noise Data*.

3.11.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XIII, states that the Proposed Project would result in a significant impact related to noise if it would:

a) Generate 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) Generate excessive groundborne vibration or groundborne noise levels.

c) For a project 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, if the project would expose people residing or working in the project area to excessive noise levels.

Since the certification of the 2014 Master Plan EIR, Appendix G of the State CEQA Guidelines has been updated several times, most substantively in 2018 (effective January 2019). While the general intent of the noise checklist has remained consistent, evaluating whether a project would cause substantial temporary or permanent noise or vibration impacts, the structure and clarity of the checklist questions have been revised. These changes do not represent new regulatory standards or new quantitative thresholds; rather, the changes reorganize and streamline the questions. For this Draft SEIR, the updated Appendix G framework is utilized, and provides a clearer, more structured basis for analyzing potential noise impacts.

CEQA still does not prescribe quantitative noise thresholds; instead, it allows lead agencies to adopt thresholds supported by substantial evidence, local ordinances, and accepted technical methodologies. The quantitative thresholds applied in this Draft SEIR are enumerated below.

Noise Compatibility

The noise standards in the LA County General Plan 2035 Noise Element are used to evaluate the acceptability of the noise levels for noise compatibility purposes during operation of the Proposed Project.

Stationary Source Noise

The County of Los Angeles Code of Ordinances establishes the maximum permissible noise level that may intrude into an adjoining property or dwelling unit (see Table 3.11-5, *County of Los Angeles Maximum Noise Levels – Stationary Equipment*).

Construction Noise

The County of Los Angeles Code of Ordinances regulates the timing of construction activities, which are limited to the weekday hours of 7:00 am to 7:00 pm. Additionally, the County's standards identified in Tables 3.11-4 and 3.11-5 shall apply. The County thresholds used in this analysis are more conservative (lower) than the City of Los Angeles construction noise thresholds, as such, use of the County thresholds provides a more protective and conservative basis for evaluating potential construction noise impacts. This analysis retains the use of the Los Angeles County construction noise thresholds and the impact analysis in this Draft SEIR applies the Los Angeles County construction noise thresholds, as the County is the lead agency and owner of the Project Site.

LAUSD identifies that a noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient levels.

Vibration

The County of Los Angeles Code of Ordinances identifies that any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The County perception threshold, or annoyance threshold, of 0.01 in/sec RMS (equivalent to 80 VdB) is similar to the FTA perception threshold of 78 VdB. In absence of a numeric threshold for building damage, the FTA thresholds of 0.2 PPV for non-engineered and masonry buildings and 0.08 PPV for historical structures are applied to this analysis.

Transportation Noise

A project will normally have a significant effect on the environment related to noise if transportation noise would substantially increase the ambient noise levels for adjoining noise sensitive areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on commonly accepted transportation noise assessment practices, including guidance from the Federal Highway Administration (FHWA), Caltrans, and other transportation noise impact methodologies, traffic noise impacts are evaluated based on incremental increase over existing ambient conditions. California environmental documents and case law recognize the use of sliding-scale thresholds (e.g., 3–5 dBA increases depending on ambient conditions) to evaluate traffic noise changes.

Consistent with these approaches, thresholds reflecting incremental change relative to existing ambient noise exposures are used to evaluate the potential perceptibility and significance of project-related traffic noise increases at sensitive receptors. These thresholds apply a more stringent allowable increase where existing ambient noise levels are higher, consistent with established transportation noise evaluation principles.

A significant impact would occur if project traffic noise increases would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

A significant traffic noise impact occurs when the thresholds above are exceeded under with project conditions and the contribution of the project to future traffic is calculated to be greater than 1.5 dBA to 5 dBA CNEL, based on ambient noise levels.

METHODOLOGY

Noise

Construction noise impacts associated with the Proposed Project were evaluated using an assumed construction equipment schedule and noise source levels and modeling methodologies provided by the FTA and the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008). Construction noise modeling conservatively assumes the operation of construction equipment at the Project Site property boundary closest to the residential receptors and therefore represents locations where project-related construction could result in the greatest increase in ambient noise levels. Construction noise modeling does not account for the numerous intervening structures between the Project Site and the residential receptors. Construction equipment noise source levels (expressed as maximum A-weighted sound levels [L_{max}] at 50 feet) were applied to estimate temporary noise exposure at the representative nearby on and off-site sensitive receptors.

Operational noise impacts were evaluated based on long-term buildout conditions associated with proposed land uses, including operational activities, mechanical equipment, and project-generated traffic. The Proposed Project consists of Master Plan that would guide future development on the Project Site but does not propose specific development projects at this time. Therefore, operational noise levels were estimated using published reference data, noise measurements from comparable facilities, or other industry-accepted acoustical references. Noise impacts resulting from Project-generated traffic were evaluated by modeling select roadway segments that are anticipated to result in the highest exposure at nearby sensitive receptors. The selected roadway segments directly abut existing residential uses and therefore represent locations where Project-related traffic could result in the greatest increase in ambient noise levels. The selected roadway segments include:

- Zonal Avenue between Mission Road and Charlotte Street
- Marengo Street between Lord Street and State Street
- Charlotte Street between Cornwell Street and Chicago Street

Vibration

Construction-related groundborne vibration impacts were evaluated based on reference vibration source level thresholds from the County of Los Angeles Code of Ordinances, expressed as peak particle velocity (PPV) and vibration (VdB), for typical construction equipment (e.g., bulldozers, loaded trucks, and potential high-vibration equipment such as pile drivers). The County's identified perception threshold, or annoyance threshold, of 0.01 in/sec RMS (equivalent to 80 VdB) is similar to the FTA perception threshold of 78 VdB. In absence of a numeric threshold for building damage, the FTA thresholds of 0.2 PPV for non-engineered and masonry buildings and 0.12 PPV for historical structures were applied to this analysis. Vibration

levels were assessed relative to the distance between construction activities and nearby vibration-sensitive receptors.

Operational vibration impacts were evaluated qualitatively using the County's reference vibration levels for typical operational activities associated with the Proposed Project.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future project and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.1.4, *Project Impact Analysis*, and 3.1.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would result in significant and unavoidable impacts related to construction noise. The 2014 Master Plan EIR determined that the 2014 Master Plan could result in noise and vibration levels that would exceed local thresholds during construction. Operational noise and vibration impacts were concluded to be less than significant. Table 3.11-10, *Summary of the 2014 Master Plan EIR Noise Impact Conclusions*, provides an overview of previous noise impact analyses for the Campus.

Table 3.11-10 Summary of the 2014 Master Plan EIR Noise Impact Conclusions

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
NOI-1: Expose persons to or generates noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies. This impact will occur if: 1. Any project construction activity takes place outside the hours of 7 am to 7 pm on Monday through Friday or 8 am to 6 pm on Saturdays (based on the permitted construction hours specified by the City and County government codes); or, 2. Any project construction activity generates maximum noise levels that exceed 75	Potentially Significant (construction and operation)	MM-NOI-1 through MM-NOI-5	Significant and Unavoidable (construction) Less Than Significant (operation)

Table 3.11-10 Summary of the 2014 Master Plan EIR Noise Impact Conclusions

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
dBA at any off-site residential receptor (based on the City of Los Angeles Municipal Code); or, 3. Any project construction activity generates maximum noise levels that exceed 85 dBA at on-site medical center buildings that house patients (based on County code); or, 4. New non-residential buildings constructed as part of the proposed project fail to comply with the exterior-to-interior noise control standards of the California Green Building Standards Code (see Section 5.507); or, 5. New residential buildings constructed as part of the proposed project fail to comply with the allowable interior noise level standards of the County of Los Angeles Building Code (45 dBA L_{dn} or CNEL); or, 6. Project operations general noise levels at any off-site noise-sensitive receptors in excess of those permitted by the City of Los Angeles Noise Ordinance (see Section 111.02).			
NOI-2: Exposes persons to or generate excessive groundborne vibration or groundborne noise levels. This impact will occur if vibration from construction activities exceeds a PPV of 0.01 at any sensitive building, including	Potentially Significant (construction) Less Than Significant (operation)	MM-NOI-6	Significant and Unavoidable (construction)

Table 3.11-10 Summary of the 2014 Master Plan EIR Noise Impact Conclusions

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
on-site medical center buildings that house patients (based on County code).			
NOI-3: Results in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Based on the *L.A. CEQA Thresholds Guide*, this impact will occur if: 1. Project traffic or on-site operations increase the CNEL at any off-site noise-sensitive receptor by 3 dB or more to or within the "normally unacceptable" or "clearly unacceptable" noise level range for the receptor's land use; or, 2. Project traffic or on-site operations increase the CNEL at any off-site receptor by 5 dB or more.	Less Than Significant (construction) Potentially Significant (operation)	MM NOI-4	Less Than Significant (operation)
NOI-4: Results in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Based on the *L.A. CEQA Thresholds Guide*, this impact will occur if the 1-hour L_{eq} from project construction activities would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use.	Potentially Significant (construction and operation)	MM-NOI-1 and MM-NOI-5	Significant and Unavoidable (construction) Less Than Significant (operation)

Table 3.11-10 Summary of the 2014 Master Plan EIR Noise Impact Conclusions

Significance Criteria [1]	Significance before Mitigation	Mitigation Measure [2]	Significance after Mitigation
NOI-5: Is located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
NOI-6: Is located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and exposes people residing or working in the project area to excessive noise levels.	The 2014 NOP/IS prepared for the 2014 Master Plan EIR determined that the 2014 Master Plan Project would result in no impacts in the area.		

Source: County of Los Angeles 2014

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which are sometimes different.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures from in the 2014 Master Plan EIR, along with proposed revisions.

3.11.4 Project Impact Analysis

a) Would the project generate 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?

Construction

The Proposed Project's construction activities would occur at various locations within the boundaries of the Project Site. According to Section 12.08.580 of the County of Los Angeles Code of Ordinances, construction activities are exempt from the County's exterior noise standards. In accordance with the County of Los Angeles Code of Ordinances construction activities are assumed to occur daily, between 7:00 am and 7:00 pm, except all day Sundays and legal holidays. If, during development of the final construction schedules for phased activities under the Proposed Project, it is deemed necessary to work outside the permitted hours, the

Project Applicant would follow necessary procedures to obtain an appropriate variance in accordance with Section 12.08.580 of the County of Los Angeles Code of Ordinances.

All internal-combustion-engine powered equipment or machinery would be equipped with suitable exhaust and air-intake silencers in proper working order, as required by California Vehicle Code Section 27150 and applicable California Code of Regulations, Title 8 (Cal/OSHA) requirements. Additionally, all mobile and fixed noise-producing equipment during construction that is regulated for noise output by a local, State, or federal agency shall comply with such regulations while in the course of project activity. Moreover, as discussed in Chapter 2, *Project Description*, of this Draft SEIR, the Proposed Project's construction activities would occur in phases. The phases of construction and anticipated construction equipment are summarized in Table 3.11-11, *Construction Noise Modeling Attenuation, dBA Leq*, along with the associated maximum noise levels at a reference distance of 50 feet. For the purposes of this analysis, on-site receptors are considered to be 50 feet from the nearest proposed implementing project activity of the Proposed Project. Table 3.11-11 also includes the distances from the nearest proposed implementing project activity of the Proposed Project to the nearest off-site sensitive receptor. Approximate distances to the nearest off-site sensitive receptors were measured from the Project Boundary to the property line of the nearest receptor using aerial imagery and measurement tools available in Google Earth. The analysis of construction noise impacts conservatively assumes that construction phases under the Proposed Project have the potential to overlap and is based on the same construction assumptions used in Chapter 3.2, *Air Quality*, of this Draft SEIR.

As shown in Table 3.11-11, pile driving may occur during the construction process. Typical maximum pile driving noise levels are 101 dBA at 50 feet, and would be reduced to 85 dBA L_{max} and below 75 dBA L_{max} at distances of 300 feet and 1,080 feet, respectively.

As shown in Table 3.11-10, typical project construction noise levels at off-site sensitive receptor properties would be below the applicable threshold of 85 dBA L_{max} for semi-residential/commercial uses and 75 dBA L_{max} for single-family residential uses during typical construction activities. However, for construction that involves pile driving and/or occurs close to the Project Site boundaries that are in the vicinity of sensitive receptors, maximum noise levels would exceed 75 dBA L_{max} for single-family residential uses and 85 dBA L_{max} for semi-residential/commercial uses. In addition, construction activities could occur in proximity to existing the existing Medical Center and its related buildings, and would exceed 85 dBA L_{max} for on-site receptors. Construction activities would temporarily increase noise levels above existing ambient conditions at the nearby on and off-site receptors. As shown in Table 3.11-12, *Temporary Construction-Related Noise Level Increases, dBA Leq*, increases could exceed ambient noise levels by more than 10 dBA at the closest receptors during peak construction activities. Impacts would be **significant**.

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Table 3.11-11 Construction Noise Modeling Attenuation, dBA L_{eq}

Construction Phase	RCNM Reference Noise Level [1]	Receptor							
		Spiritual Center to the North	Francisco Bravo Medical Magnet High to East	Hazard Park and Recreational Center to Northeast	East Los Angeles Occupational Center to East	Residences to Southeast	Residences to South	Residences Adjacent to NB I-5 On Ramp to West	Residences Along Alhambra to North
Distance in feet	*50*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Demolition	85	69	60	68	58	66	74	77	61
Site Preparation	85	69	60	68	58	66	74	77	61
Grading	85	69	60	68	58	66	74	77	61
Distance in feet	*50*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Building Construction	80	64	55	63	53	61	69	72	56
Architectural Coating	74	58	49	57	47	55	63	66	50
Distance in feet	*50*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Paving	80	64	55	63	53	61	69	72	56
Distance in feet	*50*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Finish/Landscaping	80	64	55	63	53	61	69	72	56
Distance in feet	*50*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Pile Driving	101	**85**	76	**84**	74	**82**	**90**	**93**	77

Source: PlaceWorks 2025
Note: **Bold** indicates an impact.
[1.] Obtained or estimated from FTA 2018 and/or FHWA 2008 (RCNM)

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Table 3.11-12 Temporary Construction-Related Noise Level Increases, dBA L_{eq}

Receptors	Measured Ambient Noise	Peak Construction Noise Level	Increase Over Ambient
Spiritual Center to the North	56	69	Up to 13
Francisco Bravo Medical Magnet High to East	61	60	No Increase
Hazard Park and Recreational Center to Northeast	56	68	Up to 12
East Los Angeles Occupational Center to East	68	58	No Increase
Residences to Southeast	65	66	Up to 1
Residences to South	61	74	Up to 13
Residences Adjacent to Northbound I-5 on Ramp to West	61	77	Up to 17
Residences Along Alhambra to North	71	61	No increase

Impact NOI-1: If pile driving activities or other high noise construction activities occur, construction activities associated with phased implementation of the Proposed Project have the potential to result in temporary noise increases in excess of applicable standards .

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

- To the extent feasible, construction activities shall occur between the hours of 7:00 am to 7:00 pm on Monday through Friday and 8:00 am to 6:00 pm on Saturdays, consistent with Section 12.08.520 of the County of Los Angeles Code of Ordinances. Construction activities shall not occur at any time on Sundays or legal holidays. Construction personnel shall not be permitted on the job site, and material or equipment deliveries and collections should not be permitted outside of these hours. If construction activities must occur outside of the allowable hours, the Project Applicant(s) shall follow necessary procedures to obtain an appropriate variance in accordance with Section 12.08.580 of the County of Los Angeles Code of Ordinances prior to conducting such activities. Construction activities occurring outside the allowable hours shall comply with all conditions of the approved variance.

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

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

Operation

Operational noise sources resulting from development of uses included in the Proposed Project would result in additional traffic on surrounding streets, as well as on-site noise sources such as medical equipment, parking lot activities, and general noise resulting from activation of the Project Site, including but not limited to residential activities, commercial activities, educational uses, community facilities, and activities at proposed outdoor spaces as further described below.

As part of the Proposed Project's design and permitting, all new buildings and facilities on the Project Site would be required to comply with applicable County of Los Angeles Building Code provisions, including the 45 dB CNEL interior noise standard for residential uses (Section 12.08.400 of the County of Los Angeles Code of Ordinances), and CALGreen exterior-to-interior noise attenuation requirements for non-residential uses within the 65 dB CNEL contour of adjacent transportation corridors. Compliance with these mandatory standards ensures that interior spaces are designed to maintain acceptable noise levels for occupants through appropriate architectural treatments, such as sound-rated glazing, enhanced façade assemblies, or other commonly applied design features. Although these requirements relate to interior noise exposure, an issue not considered a CEQA impact, they provide regulatory assurance that on-site development would be constructed consistent with current building code standards.

Residential Uses

Consistent with AB 1307, noise generated by occupants and their guests (e.g., voices from balconies, gatherings, or typical domestic activity) shall not be treated as a significant environmental effect under CEQA for the Proposed Project's residential uses. Operational noise associated with residential land uses generally consists of localized and intermittent activities such as conversation, small-scale HVAC operation, and routine household activities, which are typically lower in intensity and duration. Representative residential noise sources such as conversation and air conditioning equipment generally range around approximately 60 dBA at 3 feet, while louder activities such as landscape maintenance are intermittent in nature. Nevertheless, the residential buildings would be designed to comply with applicable County noise regulations, which establish exterior and interior performance standards that limit noise

exposure at sensitive receptors. Compliance with County standards, where relevant, would provide additional assurance that residential operations would not introduce substantial noise beyond typical urban ambient conditions. Federal transportation guidance identifies sources such as transportation facilities, large mechanical equipment, loading areas, or other intensive stationary noise generators as primary contributors to community noise environments; these uses produce sustained high noise levels. As residential activity does not include these types of sources and because surrounding areas already experience similar community-related noise, the Proposed Project's residential uses would not result in a significant increase in ambient noise levels. Impacts associated with residential noise would be **less than significant**.

Educational Uses

The Proposed Project includes educational uses, which similarly are not typically associated with substantial stationary or high-intensity operational noise sources. The Proposed Project's educational uses are not anticipated to be owned or operated by LAUSD. Accordingly, LAUSD-specific design standards and Caltrans noise criteria that LAUSD utilizes are not directly applicable regulatory requirements for the Proposed Project. The use of LAUSD noise standards in this analysis is therefore limited to evaluating potential impacts on off-site LAUSD-sensitive receptors and does not represent regulatory requirements applicable to implementation of the Proposed Project. Project impact significance determinations are based on the applicable thresholds identified by the lead agency.

At this time, the Proposed Project does not identify the specific location, design, or configuration of the proposed educational uses within the Project Site. Because the precise siting of the proposed educational uses relative to off-site sensitive receptors has not been determined, a quantitative comparison of operational school noise to applicable City exterior noise standards or Caltrans exterior noise standards as applied by LAUSD cannot be conducted. Therefore, a qualitative assessment of the potential operational noise associated with the proposed educational uses is provided.

Noise from educational facilities generally results from student circulation, outdoor play or gathering areas, and routine daytime classroom activity. These noises are common within urban and institutional campuses and would be comparable to existing human activity levels already present on-site. Additionally, educational buildings would be required to comply with applicable County noise regulations governing stationary and operational sources, ensuring noise generated during operation remains within acceptable levels at nearby receptors.

Outdoor activities conducted on public playground and public or private school grounds, including but not limited to school athletic and school entertainment events would be exempt from the County's noise standards in accordance with Section 12.08.570; however, such exemptions do not preclude evaluation of operational noise impacts under CEQA. Operational noise associated with the Proposed Project was therefore assessed using applicable County

noise standards to evaluate potential off-site effects at nearby sensitive receptors, including residential uses and nearby school sites.

Based on the nature of the proposed operational activities, the Proposed Project's educational uses would generate noise typical of intermittent human activity (e.g., voices, recreation, and routine campus circulation) rather than continuous mechanical or industrial noise sources. Unlike fixed mechanical equipment or commercial loading operations, these activities do not typically generate sustained high noise levels that would exceed applicable exterior operational noise standards at off-site receptors.

In addition, distance separation, intervening buildings, and existing urban ambient noise conditions would further reduce the potential for operational school activities to result in exceedances of City exterior noise limit of 50 dBA at nearby residential or Caltrans' exterior noise limit of 65 dBA as applied by LAUSD at school receptors. Therefore, significant operational noise impacts related to educational uses are not anticipated. Because educational activities would be limited primarily to daytime hours and would be subject to applicable noise standards, operational noise associated with educational uses would be **less than significant**.

Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if traffic resulting from that project would substantially increase the ambient noise levels for adjoining areas. According to Caltrans, changes between 1 and 2 dBA are usually indiscernible (Caltrans 2023). A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are typically considered incompatible with sensitive land uses such as residences, schools, and noise environments. Where existing traffic noise levels are at or below the applicable noise standard, a significant impact would occur if the Proposed Project would increase traffic noise levels by 3 dBA CNEL or more at sensitive receptor locations. Where existing noise levels already exceed the applicable standard, the analysis focuses on whether the Proposed Project would substantially increase noise levels relative to existing conditions. For purposes of this analysis, a substantial increase is generally considered an increase of 3 dBA CNEL or greater over existing conditions.

Roadway segment average daily traffic volumes were provided by Fehr & Peers (see Chapter 3.15, *Transportation*). To analyze noise increases associated with project-generated traffic, four different traffic scenarios were analyzed: 1) Existing, 2) Existing with Proposed Project, 3) Future without Proposed Project, and 4) Future with Proposed Project. The effect of Project-generated traffic was isolated by comparing Existing conditions to Existing with Proposed Project conditions, and Future without Proposed Project conditions to Future Proposed Project conditions.

These comparisons allow the analysis to identify the incremental increase in roadway noise levels attributable to traffic generated by the Proposed Project under both near-term and cumulative future conditions. The traffic noise modeling results are summarized in Table 3.11-13, *Estimated Traffic Noise Levels*. Proposed Project-generated traffic would increase traffic noise levels in the vicinity of the Project Site, specifically, by 1 dBA CNEL along Zonal Avenue and Charlotte Street and 3 dBA CNEL along Marengo Street. The Proposed Project's traffic noise would exceed the noise level increase threshold of 1.5 dBA CNEL in ambient noise environments of greater than 65 dBA CNEL along Marengo Street, between Lord Street and State Street. Operation of full buildout conditions under the Proposed Project would increase roadway traffic volumes along Marengo Street, resulting in modeled traffic noise increases of up to approximately 3 dBA CNEL at nearby residences. This increase would further contribute to and worsen the existing elevated noise environment experienced by receptors along this corridor. Residents in this area are currently exposed to elevated noise levels due to proximity of both the I-5 and I-10 freeways in addition to existing roadway network traffic noise. Specifically, the closest residence to I-5 along this portion of the corridor is a single-family residence at the corner of Lord Street and Marengo Street; this residence is located approximately 100 feet east of the I-5 on-ramp and approximately 700 feet north of I-10. Additional residential receptors are located along Pomeroy Avenue, approximately 450 to 500 feet south of Marengo Street, which are similarly situated within the broader freeway-influenced noise environment, although farther from the Marengo Street roadway corridor. The residences south of Pomeroy Avenue are located approximately 130 feet north of I-10.

Therefore, impacts associated with Project-generated operational noise would be potentially **significant**.

Table 3.11-13 Estimated Traffic Noise Levels

	Estimated Traffic Noise Levels at 50 feet from Roadway Centerline, dBA CNEL					
Roadway/Segment	**Existing**	**Existing Plus Project**	**Change**	**Future without Proposed Project**	**Future with Proposed Project**	**Change**
Zonal Avenue between Mission Road and Charlotte Street	64	65	1.0	64	65	1.0
Marengo Street between Lord Street and State Street	70	73	3.0	70	73	3.0
Charlotte Street between Cornwell Street and Chicago Street	63	64	1.0	64	65	1.0

Impact NOI-2: The Proposed Project has the potential to result in permanent noise increases in excess of applicable standards under operational conditions related to traffic.

Mitigation: No feasible mitigation available.

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

No feasible mitigation measures have been identified that would substantially reduce impacts associated with a substantial increase in traffic noise levels for all roadways showing significant impacts. For these reasons with the paragraph above, the noise reduction measures evaluated were found to be infeasible and are not recommended for implementation. Therefore, impacts would remain **significant and unavoidable.**

Parking Activity

Based on the trip generation data provided in the Proposed Project's traffic study, the Proposed Project would include approximately 8,588 parking spaces, to be accommodated in structured and surface parking areas. Parking areas would be strategically located to accommodate the various uses at designated locations, in consideration of the three main access points into the Project Site (from Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue). Noise generated by vehicles parking on-site, would not be sufficient to exceed County noise standards for the following reasons:

- These vehicles would be distributed between various parking facilities and uses throughout the Project Site, including above ground and below ground parking structures.

- Typical noise sources with parking lots and parking structures are short term in nature (e.g., engines starting, doors slamming, low operating speeds, etc.) and are not anticipated to contribute significantly to overall noise levels when averaged over a 1-hour period.
- Parking lot noise would be sporadic, occur at relatively low noise levels compared to existing roadway traffic along Marengo Street, Zonal Avenue, and Mission Road, and would attenuate rapidly with distance.

The Proposed Project would be a continuation of the fundamental natural of parking operations within the Project Site, which already occur. While the ultimate location or configuration of specific parking areas may shift under the Proposed Project, noise from parking activity would continue to be substantially lower than existing traffic noise along the adjacent roadway network, which dominates the ambient noise environment. Therefore, noise impacts from the parking lots associated with the Proposed Project would be **less than significant**.

Mechanical Equipment, Warehouse Uses, and Clean Tech/Light Industrial Uses

Internal compatibility between proposed land uses is a project design consideration and is addressed through site planning and building design; consistent with CEQA, this analysis focuses on potential noise impacts to on- and off-site sensitive receptors.

The Proposed Project would allow warehouse uses, including storage, as well as a range of clean tech/light industrial, which could include laboratories, light manufacturing, and scientific research. These types of uses may generate operational noise from stationary mechanical equipment, loading and unloading activities, and occasional truck movements. Table 3.11-14, *Common Stationary Sources of Noise*, identifies noise levels generally associated with common stationary noise sources.

Table 3.11-14 Common Stationary Sources of Noise

Stationary Noise Source	L_{eq}
Commercial Car Wash	79 dBA
Drive Thru Activity	89 dBA
Gasoline Dispensing Station	65 dBA
Generators	75 dBA
HVAC Mechanical Equipment	60 dBA
Parking Garage	53 dBA
Regional Shopping Center Parking Lot	61 dBA
Small Parking Lot	53 dBA
Tire and Lube Service Station	62 dBA
Truck Backup Beeper	79 dBA
Truck Yard/Warehouse	63 dBA

Warehouse uses typically generate noise associated with truck loading and unloading, operation of forklifts, and building mechanical systems, although these activities are generally intermittent and occur primarily during daytime hours. Similarly, clean tech/light industrial uses such as laboratories and light manufacturing may generate operational noise from ventilation systems, pumps, compressors, or specialized research equipment. Impacts would be potentially **significant**.

The Proposed Project would introduce a variety of new mechanical equipment throughout the Project Site. This would include rooftop heating, ventilation and air conditioning (HVAC) equipment, and ventilation fans for subterranean parking. The Proposed Project could include the construction and operation of a new central utility plant to replace the existing aging and inefficient central plant currently serving portions of the Campus. Central plants typically generate steady, continuous noise from mechanical systems such as chillers, cooling towers, pumps, boilers, air handling units, and emergency power equipment. The existing central plant is older and relies on outdated equipment that generally operates at higher noise levels compared with modern mechanical systems.

If constructed, the new central plant would use updated, higher-efficiency equipment designed to meet current energy and mechanical code requirements, which are typically designed to produce lower operational noise and allow for more effective noise control. Operational noise generated by stationary mechanical equipment would be required to comply with applicable County of Los Angeles exterior noise requirements at adjacent property lines. In addition, mechanical equipment noise levels would be limited so as not to exceed the existing ambient noise level by more than 5 dBA at receiving properties. Compliance with the County's exterior noise standards would be achieved through standard acoustical design practices, including equipment selection, setbacks, shielding, and acoustical enclosures, as necessary. Future replacement or addition of a central plant and/or other new utility equipment would be similar to existing supporting facilities on the Project Site. Typically, these types of facilities, like the existing central plant, are located in mechanical rooms made of solid masonry blocks with double louvered vents, solid core access doors, and interior noise absorbent treatment for interior to exterior noise reduction that would ultimately be designed to comply with County Code noise limits at exterior areas of off-site receptors and interior areas of on-site receptors. Based on adherence to the requirements, operation of central plant mechanical equipment would be compatible with applicable Los Angeles County land use noise compatibility criteria and would not result in a substantial increase in noise levels at nearby on- and off-site sensitive receptors. As part of the Proposed Project design, all mechanical equipment would be required to comply with applicable County of Los Angeles exterior noise standards at the nearest property lines. Compliance with these standards would be achieved through standard design practices such as locating mechanical equipment away from sensitive receptors, installing equipment within mechanical rooms or rooftop enclosures, using acoustical shielding or parapet walls, and incorporating manufacturer-provided noise control features. Through implementation of these design measures, operational noise from mechanical equipment

would not generate noise levels that exceed applicable exterior noise standards at nearby receptors.

For purposes of CEQA impact evaluation, operational mechanical equipment noise is assessed at nearby on- and off-site noise-sensitive receptors, which represent the locations at which potential project-related noise effects would be experienced. Compliance with applicable stationary-source noise limits would reduce incompatibility with surrounding on- and off-site receptors.

Design features commonly employed to achieve compliance, such as rooftop or ground-mounted equipment enclosures, parapet walls, acoustical screening, and silencers for exhaust and intake openings, would be incorporated as necessary based on final equipment specifications and acoustical evaluation. If constructed, the new central plant would replace older, noisier equipment and would be required to operate in compliance with County noise standards, its operation is expected to maintain or reduce existing central plant-related noise levels in the surrounding environment. Accordingly, if constructed, operation of the new central plant would not result in a substantial permanent increase in ambient noise levels and would result in a **less-than-significant impact**.

Due to the size of the Project Site and its existing and proposed levels of development, much of the mechanical equipment, would be shielded by intervening structures, rooftop parapets or noise walls. In addition, mechanical equipment associated with new buildings would be designed to meet the intent of the applicable noise performance standards, including stationary-source requirements that limit mechanical equipment noise to no more than 5 dBA above the existing ambient noise level at adjacent receiving properties, as measured at the property line. Incorporating principles of equipment siting, shielding, and attenuation into system design would minimize the potential for noise from mechanical equipment to increase ambient noise levels at off-site sensitive receptors in excess of standards. The Proposed Project could include a new central plant that would provide heating and cooling services to Campus facilities. Based on the available information regarding the central plant and the anticipated incorporation of standard noise-control design features (e.g., enclosure of equipment within buildings and acoustical shielding), operation of the central plant is not expected to exceed applicable County exterior noise standards at nearby receptors.

However, because the Proposed Project is conceptual and programmatic in nature, the final type, location, and configuration of the warehouse uses, clean tech/light industrial and mechanical equipment associated with future development within the Project Site area have not been yet determined. As a result, the possibility exists that certain warehouse uses, clean tech/light industrial and on-site mechanical equipment could increase ambient noise levels and exceed the applicable daytime and/or nighttime noise standards. Therefore, the operational noise associated with future mechanical equipment is conservatively considered potentially **significant**.

Emergency Vehicles

Sirens from emergency vehicles are an existing source of daytime and nighttime noise associated with the Project Site. Ambulance activity would continue to occur as part of normal hospital operations. Emergency vehicles current access the Project Site from Marengo Steet using a dedicated driveway at 1983 Marengo Street to take patients directly to the emergency room doors at the Medical Center. Additionally, ambulances may access the Project Site from Marengo Street and Zonal Avenue and travel along State Street to reach the Medical Center. While sirens generate very high, short-tern noise levels, they are excluded from the County's noise standard in accordance with Section 12.08.570 of the County of Los Angeles Code of Ordinances and would not be considered a violation of the County's Code of Ordinances. Additionally, sirens are typically deactivated upon entering hospital property and approaching designated ambulance receiving areas. As such, ambulance operations would not generate a substantial increase in operational noise levels beyond those associated with existing medical campus activities.

Implementation of the Proposed Project would not expand on-site emergency room facilities and is not anticipated to increase the number of ambulances accessing the Medical Center. Additionally, the Proposed Project would not alter emergency vehicle access to the Medical Center. Therefore, the Proposed Project would not result in an increase in emergency vehicle noise levels, or the frequency of their occurrence, in the surrounding community. Impacts would be **less than significant**.

Outdoor Events

The Proposed Project includes a number of outdoor spaces that would provide a variety of uses ranging from walking, biking, and informational gatherings to organized events. Noise generated by passive day-to-day use of the outdoor spaces would continue and be limited to the intermittent sounds of conversational outdoor noise and would not be expected to exceed the applicable noise standards of the County's Code of Ordinances. Outdoor use areas anticipated to support organized activities, such as community events or markets, would be planned and managed. These design and operational measures, while not mandated, represent additional noise-reducing practices that align the Proposed Project with established urban noise management standards. However, noise generated by large, organized events would have the potential to result in an increase in ambient noise above applicable standards. Impacts would be potentially **significant**.

Combined Operational Noise

During operation, multiple noise-generating activities could occur simultaneously on the Project Site, including building mechanical equipment (e.g., HVAC systems), vehicle circulation, loading/parking activities, and outdoor human activity associated with the proposed uses.

When these sources operate concurrently, the combined effect of multiple noise sources could result in higher overall noise levels than any individual source operating alone. Because the Proposed Project is programmatic and the precise locations, specifications, and operational characteristics of future development (including mechanical equipment, circulation patterns, and activity areas) have not yet been finalized, it is not feasible to quantitatively model the combined noise contribution of all potential operational sources at this time. However, individual operational noise sources associated with future development would be required to comply with applicable County noise regulations and building standards intended to minimize noise exposure at nearby sensitive receptors, thus reducing the combined noise contribution of all potential operational sources. Additionally, the introduction of new development (intervening structures) would provide shielding of Project noise at on- and off-site sensitive receptors. Accordingly, while the combination of operational noise sources could increase noise levels locally, compliance with applicable regulations would ensure that operational noise levels remain within allowable limits. Impacts would be potentially **significant**.

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

Mitigation Measure NOI-3a: Design Project Facilities to Ensure All Mechanical Equipment Complies with County Noise Standards. During the architectural and engineering design phase of each new facility (building, central plant, parking structure, etc.) that could introduce new mechanical equipment to the Project Site, and prior to the issuance of any building permits for the facility, the Project Applicant(s) shall retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Section 12.08.390 of the Los Angeles County Code of Ordinances to reduce impacts to off-site receptors. Such recommendations may include, but are not limited to: changes in equipment locations, upgrades to central plant buildings, rooftop parapet walls, acoustical louvers or screens, or intake and exhaust silencers.

Mitigation Measure NOI-3b: Design and Manage Outdoor Use Areas to Ensure Organized Outdoor Events Comply with County Noise Standards. Prior to the issuance of any building permits for outdoor use areas that are anticipated to host organized events such as outdoor markets, farmers markets, summer concerts and health marches, etc. the Project Applicant(s) shall retain an acoustical consultant to evaluate the design (event layout, sound system design, etc.) and operational event details (crowd sizes, times of operation, etc.) to ensure that such events will comply with Section 12.08.390 of the Los Angeles County Code of Ordinances to reduce impacts to off-site receptors. Such recommendations may include, but are not limited to: controls on crowd sizes and event times, and limits on sound system power levels.

Significance with Mitigation: Less than significant. Compliance with applicable CALGreen and County interior noise standards, as described in the Regulatory Setting, requires that interior noise levels within future buildings meet applicable performance requirements. Additionally, with the implementation of Mitigation Measures NOI-3a and NOI-3b, operational impacts associated with the Proposed Project would be reduced to less than significant levels as these mitigation measures would ensure compliance with existing County noise standards, and in doing so, would meet the City of Los Angeles standards. Specifically, Mitigation Measure NOI-3a requires a qualified acoustical consultant to evaluate the design of all new facilities that include mechanical equipment during the architectural and engineering design phase to confirm compliance with Section 12.08.390 of the Los Angeles County Code of Ordinances. The acoustical consultant shall identify and recommend appropriate noise-control measures, which are standard engineering controls routinely used to ensure that mechanical equipment complies with applicable County noise limits.

Similarly, Mitigation Measure NOI-3b requires that organized outdoor events be evaluated and designed to ensure compliance with applicable County noise standards. Because these measures require site-specific acoustical analysis and implementation of feasible-noise control design features prior to construction or event operation, these measures provide a mechanism to ensure compliance with applicable noise standards. With implementation of Mitigation Measures NOI-3a and NOI-3b, impact would be reduced to **less than significant** levels.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities, including staging of construction equipment, would occur within the boundaries of the Project Site. Heavy construction equipment has the potential to produce groundborne vibration levels that would exceed applicable vibration standards. Various pieces of heavy equipment, such as graders and excavators, would be used throughout the Project Site. Based on data published by the FTA, this type of equipment (bulldozer) typically produces PPV vibration levels of 0.089 inches per second (in/s) at a distance of 25 feet (refer to Table 3.11-15, *Vibration Damage Attenuation*). If pile driving is conducted at the Project Site, the source vibration levels would be approximately 1.518 PPV at 25 feet.

The County of Los Angeles has established a vibration perception threshold of 0.01 in/sec RMS (80 VdB). This threshold is similar to, but less restrictive than the FTA annoyance threshold of 78 VdB. In absence of a numeric threshold for building damage, the FTA thresholds of 0.2 PPV for non-engineered and masonry buildings and 0.12 PPV for historical structures. The more conservative FTA guidance threshold is used to determine impact significance.

Vibration levels from construction equipment attenuate as they radiate from the source. Predicted vibration levels are shown in Table 3.11-15, *Vibration Damage Attenuation*. Based on the construction vibration modeling conducted for the Proposed Project, it was determined that the proposed pile driving equipment would generate a maximum groundborne vibration level of 0.13 PPV at 130 feet, which represent the residences adjacent to north bound I-5 on ramp. If pile driving does not occur, the Proposed Project's heavy construction equipment would generate a maximum groundborne vibration level of 0.02 PPV at 130 feet.

Table 3.11-15 Vibration Damage Attenuation, PPV Construction Phase

	Vibration Reference Level	Receptor							
		Spiritual Center to the North	Francisco Bravo Medical Magnet High to East	Hazard Park and Recreational Center to Northeast	East Los Angeles Occupational Center to East	Residences to Southeast	Residences to South	Residences Adjacent to NB I-5 On Ramp to West	Residences Along Alhambra to North
Distance in feet	*25*	*300*	*850*	*360*	*1,080*	*435*	*170*	*130*	*840*
Pile Driver, Impact (Upper Range)	1.518	0.037	0.008	0.028	0.005	0.021	2.121	0.128	0.008
Pile Driver, Impact (Typical)	0.644	0.015	0.003	0.012	0.002	0.009	0.900	0.054	0.003
Pile Driver, Sonic (Upper Range)	0.734	0.018	0.004	0.013	0.003	0.010	1.026	0.062	0.004
Pile Driver, Sonic (Typical)	0.17	0.004	0.001	0.003	0.001	0.002	0.238	0.014	0.001
Vibratory Roller	0.21	0.005	0.001	0.004	0.001	0.003	0.293	0.018	0.001
Clam shovel	0.202	0.005	0.001	0.004	0.001	0.003	0.282	0.017	0.001
Hoe Ram	0.089	0.002	0.000	0.002	0.000	0.001	0.124	0.008	0.000
Large Bulldozer	0.089	0.002	0.000	0.002	0.000	0.001	0.124	0.008	0.000
Caisson Drilling	0.089	0.002	0.000	0.002	0.000	0.001	0.124	0.008	0.000
Loaded Trucks	0.076	0.002	0.000	0.001	0.000	0.001	0.106	0.006	0.000
Jackhammer	0.035	0.001	0.000	0.001	0.000	0.000	0.049	0.003	0.000
Small Bulldozer	0.003	0.000	0.000	0.000	0.000	0.000	0.004	0.000	0.000

Source: PlaceWorks 2026; FTA 2018

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Construction activities occurring in proximity to historic structures on the Project Site could increase the potential for vibration-related damage, as historic buildings may be more sensitive to groundborne vibration than typical modern structures. As discussed above, pile driving could generate vibration levels exceeding the FTA significance threshold of 0.2 PPV for non-engineered and masonry buildings and 0.12 PPV for historical structures. Potential impacts to historic resources from construction vibration are addressed through mitigation measures identified in Chapter 3.4, *Cultural Resources*. As identified in Chapter 3.4, Mitigation Measure CUL-1c shall be implemented, which would ensure no indirect structural damage resulting from Project-generated vibration during construction would occur. Mitigation Measure CUL-1c would require that, prior to the commencement of construction activities adjacent to a historical resource, a Conditions Assessment Report will be completed by a Historic Architect to identify baseline conditions and a Monitoring Plan, prepared by a civil engineer, to establish survey monuments and document and record the positions of adjacent buildings, structures, sidewalks, utilities, facades, and surface features to form a baseline for determining settlement or deformation.

Certain specialized facilities within the Project Site may contain vibration-sensitive equipment, such as laboratory instrumentation or medical imaging equipment. The vibration tolerance of such equipment varies widely depending on the type and sensitivity of the equipment, and detailed information regarding the presence and vibration sensitivity of specific equipment in nearby facilities is not available. However, construction vibration levels decrease rapidly with distance from the source, and the intermittent use of heavy equipment such as bulldozers would generate substantially lower vibration levels than pile driving. Therefore, the potential for disruption to vibration-sensitive equipment would primarily be associated with pile driving activities occurring in relatively close proximity to such equipment.

Typical residential and commercial uses are generally less sensitive to vibration annoyance than specialized laboratory or technical facilities. In urban environments such as the Project vicinity, occupants are typically exposed to intermittent vibration from sources such as roadway traffic, heavy trucks, and other urban activities. As a result, residential and commercial receptors are generally less susceptible to vibration-related disruption compared to facilities containing precision equipment. Nevertheless, because construction activities could generate groundborne vibration levels of 0.12 in/sec PPV or greater for historic structures, 0.2 in/sec PPV for typical structures, and 78 VdB for annoyance if pile driving is conducted, impacts would be **significant**.

Impact NOI-4: Should pile driving be required during construction activities, such equipment would have the potential to result in groundborne vibration or noise in excess of applicable standards.

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

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

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

Operation

The Proposed Project would redevelop the Project Site with similar land uses that currently exist; however, the Proposed Project would introduce new uses to the Project Site including residential, commercial, and educational uses. The types of land uses proposed are not those associated with substantial sources of groundborne vibration or noise. Operational activities such as vehicle circulation, pedestrian activity, building mechanical systems, typical operation and maintenance activities, and typical residential or institutional functions generate vibration levels that are minimal and generally imperceptible at distances beyond a few feet from the source. These activities would be similar to, or in some cases replace existing uses currently operating on the Project Site. Project operation would continue to comply with the County's and City's vibration-related standards, which provide performance-based limits ensuring that groundborne vibration does not exceed levels capable of causing annoyance or damage at off-site sensitive receivers. Therefore, operational vibration impacts would be less than significant. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

c) For a project 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?

Construction

As previously discussed, the Project Site is not located within two miles of a public airport or public use airport. The nearest airport is the San Gabriel Valley Airport, located approximately 10 miles northeast. Therefore, the Campus would not expose people residing or working in the Project area to excessive air traffic related noise levels. **No impact** would occur.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

The existing Project Site includes two helipads for the transportation of patients to the emergency room by air ambulance. One helipad is on the roof of the medical center building and one is at grade on the west portion of the Campus. Typical flight operations are summarized as follows: a helicopter lands on the roof-top helipad and the flight staff takes the patient down the trauma elevators to the emergency room; after the patient and flight staff are in the hospital, the helicopter moves to the on-grade helistop to wait for the flight staff; flight staff departs the Emergency Department and walks to the on-grade helistop. On occasion, when there is already a helicopter on the roof, a patient is landed on the at-grade helistop and an ambulance takes the patient to the emergency room.

As with the 2014 Master Plan Project, the Proposed Project would relocate the at-grade helipad to elsewhere within the Project Site. However, this change within the Project Site would not result in a change in the overall number of landings at the Campus or typical flight paths utilized by incoming helicopters. In addition, individual landings and on-site helicopter movements would be relatively short in duration. Helicopter noise is not anticipated to change significantly as a result of the Proposed Project. Therefore, the noise impacts associated with helipads would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.11.5 Cumulative Impact Analysis

Noise is inherently a localized environmental issue, and cumulative noise impacts typically occur when multiple projects introduce overlapping or additive noise sources within the same geographic area. The cumulative geographic study area used to assess potential cumulative noise impacts consists of the existing Campus, adjacent uses, and uses within the vicinity of the

Project Site. For the purposes of this analysis, a radius of 1,000 feet from the Project Site boundaries was considered. The cumulative study area identified in this Draft SEIR is similar to the study area identified Plan EIR. The full list of 13 cumulative projects applicable in the Proposed Project's cumulative analyses is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to noise?

NOISE LEVEL INCREASES

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, substantially increase impacts related to noise. The study area is in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Construction noise is temporary and localized, and overlapping construction schedules with other project could result in short-term increases in noise at shared receptors. A related project within 1,000 feet of the Project Site is the Boyle Heights Community Plan Update Project (Cumulative Project 3). The Proposed Project would result in significant and unavoidable impacts related to construction noise with the implementation of mitigation. Because construction impacts from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. The Proposed Project's unavoidable construction impacts, which would be phased over a 25-year period, could overlap with other future projects. Additionally, there is a potential for development projects within the Boyle Heights Community Plan area to be within 1,000 feet of the Project Site. This would contribute directly to an overall cumulative effect. Therefore, cumulative impacts would be **significant**.

Impact NOI-5: The Proposed Project's construction activities would result in cumulative impacts related to increases in ambient noise.

Mitigation: Implement Mitigation Measure NOI-1.

Significance with Mitigation: Significant and unavoidable. While the implementation of Mitigation Measure NOI-1 would reduce construction noise levels at the Project Site, Mitigation Measure NOI-1 would not reduce construction noise impacts to a less that significant level if pile driving is conducted. If pile driving is not conducted, Mitigation Measure NOI-1 would reduce the Proposed Project's construction noise levels to a less-than-significant impact. Because there is a potential for pile driving to occur during construction, construction noise impacts are considered **significant and unavoidable**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, substantially increase impacts related to noise. The study area is in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Operational noise generated by the Proposed Project such as building mechanical equipment, loading activities, and general on-site operations would be similar in character to existing institutional and hospital uses and would be required to comply with applicable noise standards. With implementation of mitigation measures applicable to stationary sources, operational noise levels would not exceed applicable exterior noise standards at nearby property lines. Compliance with these standards would ensure that stationary-source noise generated by the Proposed Project would not introduce noise levels that exceed established municipal limited intended to protect nearby sensitive receptors.

In the cumulative context, other existing and reasonably foreseeable projects in the surrounding area could introduce additional stationary noise sources such as building mechanical equipment or operational activities (warehouse and clean tech/light industrial). However, these project would similarly be required to comply with applicable noise regulations governing stationary-source noise. Because the Proposed Project would be required to meet the same or similar noise performance standards through implementation of the identified mitigation measures, the Proposed Project would not cumulatively contribute to stationary-source operational noise increases. Impacts would be **less than significant**.

However, the Proposed Project would result in a significant and unavoidable traffic noise impacts along the segment of Marengo Street between Lord Street and State Street. Existing ambient noise levels in this corridor already exceed applicable exterior noise standards due to the combined influence of freeway traffic and local roadway traffic. Implementation of the Proposed Project would increase roadway traffic volumes along Marengo Street and would result in additional traffic noise increases of up to approximately 3 dBA CNEL at nearby residences, thereby further worsening an already elevated noise environment. Traffic generated by other cumulative development in the area would also contribute to ambient traffic noise levels. Because the Proposed Project would add additional traffic noise to an environment that already exceeds applicable standards, the Proposed Project's incremental traffic noise increase would be perceptible. The Proposed Project would contribute to the cumulative worsening of traffic noise conditions along this corridor. the Proposed Project's contribution to cumulative traffic noise impacts is considered cumulatively considerable.

Accordingly, while stationary-source operational noise impacts would remain less than significant on a cumulative basis, the cumulative traffic noise impact would be **significant and unavoidable**.

Impact NOI-6: The Proposed Project's operational traffic would result in cumulative impacts related to increases in ambient noise.

Mitigation: Implement Mitigation Measure NOI-3a through NOI-3d.

Significance with Mitigation: Significant and Unavoidable. With the implementation of Mitigation Measures NOI-3a through NOI-3d, operational impacts associated with the Proposed Project would be reduced to less than significant levels as these mitigation measures would ensure compliance with noise standards. However, no feasible mitigation measures have been identified to reduce traffic-related nose impact and impacts would be significant and unavoidable.

VIBRATION

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, substantially increase impacts related to vibration. The study area is in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Construction vibration is temporary and localized, and overlapping construction schedules with other projects could result in short-term increases in vibration at shared receptors. The Proposed Project would result in significant and unavoidable impacts related to pile driving construction activities, within 130 feet, with the implementation of mitigation. Because construction impacts from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction vibration impacts is considered cumulatively considerable. The Proposed Project's unavoidable construction impacts, which would be phased over a 25-year period, could overlap with other future projects. This would contribute directly an overall cumulative effect. Therefore, cumulative impacts would be **significant**.

Impact NOI-7: The Proposed Project's construction activities would result in cumulative impacts related to the generation of groundborne vibration or noise in excess of applicable standards.

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

Significance with Mitigation: Significant and unavoidable. Significant and unavoidable. While the implementation of Mitigation Measure NOI-4 would reduce construction vibration impacts to a less that significant level, should pile driving be required. In addition, as it relates to vibration impacts to historic structures, Mitigation Measure CUL-1c shall be implemented, which would ensure no indirect structural damage would occur.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, substantially increase impacts related to vibration. The study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. The Proposed Project's operational vibration sources would be limited to normal building occupancy, pedestrian circulation, routine vehicle movements, and building mechanical systems. These sources are generally imperceptible beyond the immediate vicinity of the source and do not generate substantial groundborne vibration. There are no known cumulative projects within the immediate area or within the vicinity of the Project Site that would introduce substantial operational vibration that would exceed applicable standards. Therefore, the Proposed Project's contribution to cumulative operational vibration impacts would not be cumulatively considerable. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

AIR TRAFFIC NOISE

Construction and Operation

Because airport-related noise is a function of aircraft operations and flight paths rather than the number of nearby development projects, cumulative impacts are generally associated with the increases in airport operations rather than incremental development in the surrounding area.

The Proposed Project, in combination with other cumulative projects within the study area, would not result in a cumulatively considerable contribution to excessive noise exposure from aircraft operations, as airport noise levels are primarily governed by Federal Aviation Administration (FAA) regulations and airport master plans. The Campus is located outside the 65 dBA CNEL for the San Gabriel Valley Airport; therefore, the Proposed Project would not be exposed to substantial noise levels when considered cumulatively with other development. Similarly, cumulative development would not meaningfully alter aircraft flight paths. Therefore, the Proposed Project's contribution would not be cumulatively considerable and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.11.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.11.4, *Project Impact Analysis*, and 3.11.5, *Cumulative Impact Analysis*, the Proposed Project would result in one significant but mitigable impact related to operational noise and three significant and unavoidable impacts related to construction noise and vibration due to pile driving and operational traffic noise.

As shown in Table 3.11-10, *Summary of the 2014 Master Plan EIR Noise Impact Conclusions,* the 2014 Master Plan EIR concluded that the 2014 Master Plan would result in three less than significant impacts with mitigation incorporated during operation, and two significant and unavoidable impact associated with construction noise and vibration due to pile driving. Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, lists the mitigation measures of the 2014 Master Plan EIR side by side with the mitigation measures in this Draft SEIR for comparative purposes. Mitigation measures MM NOI-2 and MM NOI-3 from the 2014 Master Plan EIR have been moved to the Regulatory Framework section. These measures reflect compliance with existing building code requirements related to interior noise standards and implemented through the building plan check and permitting process. Accordingly, they are not considered mitigation measures in the CEQA context and are not relied upon to reduce project impacts. This change represents a clarification in presentation rather than a substantive change in environmental analysis. The underlying requirements remain applicable to the Proposed Project and continue to ensure that future buildings achieve compliant interior noise environments.

Since the certification of the 2014 Master Plan EIR, the State CEQA Guidelines were updated in December 2018. As part of the update, the Appendix G environmental checklist was revised. With respect to noise, the 2018 State CEQA Guidelines update clarified and slightly restructured the checklist questions, emphasizing reliance on locally adopted standards and threshold of significance. Previously, the checklist asked whether a project would "expose persons to or generate noise levels in excess of standards," "result in a substantial permanent or temporary increase in ambient noise levels," and "expose people to excessive airport noise." The updated Appendix G (carried forward through 2025) consolidated and reworded these into three clearer questions: (a) whether a project would generate a substantial temporary or permanent increase in ambient noise levels above local standards; (b) whether it would generate excessive groundborne vibration or groundborne noise; and (c) whether people in the project area would be exposed to excessive noise from airports or private airstrips. The revisions removed redundant language and emphasized reliance on local general plan policies and noise ordinances to define significance thresholds, rather than prescriptive state criteria. The Proposed Project would not result in new or a substantial increase in magnitude of impacts compared to that of the 2014 Master Plan EIR.

Additionally, the 2014 Master Plan EIR included an analysis of future exterior noise levels at the Project Site resulting from traffic on adjacent roadway and nearby freeways. That analysis evaluated whether new on-site buildings would be exposed to noise levels exceeding applicable building code requirements. As clarified by subsequent case law, including *Ballona Wetlands Land Trust v. City of Los Angeles* and *CBIA v. BAAQMD*, CEQA is directed at evaluating the project's effect on the environment, not the environment's effect on the project. Analysis related to noise exposure of future on-site buildings therefore do not constitute CEQA impacts and are no longer used for determining significance.

3.11.7 References

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3.12 POPULATION AND HOUSING

This chapter of the Draft SEIR describes the existing population and housing conditions of the Project Site and City of Los Angeles and identifies applicable regulatory requirements. It discusses the potential impacts related to population and housing from the implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, comments were received regarding population and housing associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where comments regarding these issues were also received. The NOP and all scoping comments are included in Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. Comments related to population and housing were considered in the preparation of this analysis.

3.12.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

There are no federal regulations that apply to the Proposed Project.

STATE

CEQA Guidelines Section 15126.2(e), Growth-Inducing Effects

Pursuant to Section 15126.2(e) of the State CEQA Guidelines, an EIR must discuss whether a project would directly or indirectly foster growth. Section 15126.2(e) reads as follows:

> [An EIR shall discuss] the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion

> of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, [the EIR shall] discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Regional Housing Needs Assessment

The State of California housing laws call upon local jurisdictions to provide a fair-share of housing to meet the needs of California's residents. In implementing this law, the California Housing and Community Development Department (HCD) assigns fair-share housing targets to each of the Councils of Governments (COG) in the State based on the California Department of Finance (DOF) population projections and regional forecasts. The Regional Housing Needs Assessment (RHNA) is mandated by State housing law as part of the periodic process of updating the housing element of each local General Plan (SCAG 2025). State law requires each regional COG to determine existing and future housing needs for its region (California Government Code Section 65584.05[h]). The local general plan housing elements address how these housing targets can be achieved during an eight-year time frame given local demographics, land use, and zoning. Local jurisdictions are required to submit housing elements to HCD for review and approval. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The current planning cycle is October 2021 to October 2029 (SCAG 2025).

Senate Bill 375

Signed into law on September 30, 2008, Senate Bill (SB) 375 provides for a planning process to coordinate land use planning and regional transportation plans (RTP) and funding priorities to help California meet GHG reduction goals established by Assembly Bill (AB) 32 (CARB 2025). SB 375 requires metropolitan planning organizations (MPO), including the Southern California Association of Governments (SCAG), the local MPO, to incorporate a sustainable communities strategy (SCS) in their regional transportation plans that will achieve GHG emission reduction targets set by the California Air Resources Board (CARB). There are two mutually important facets to SB 375: reducing vehicle miles traveled (VMT) and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from or streamlined CEQA review for projects classified as transit priority projects.

REGIONAL

Southern California Association of Governments

Under federal law, SCAG is designated as an MPO; under State law it is a regional transportation planning agency and COG for the County of Los Angeles, including the Project Site. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles (SCAG 2025b). The agency develops long-range RTPs, including SCS and growth forecast components; regional transportation improvement programs; RHNA allocations; and a portion of the South Coast Air Quality Management District's air quality management plans.

Connect SoCal

The RTP/SCS is a long-range regional plan that identifies strategies that provide efficient movement of people, goods, and information; enhance economic growth and international trade; and improve the environment and quality of life. The RTP/SCS must lay out a plan to meet the SCAG region's transportation, housing, economic, and environmental needs in a way that enables the area to lower GHG emissions (SCAG 2025c). As part of the RTP/SCS document, SCAG develops population and housing forecasts for the SCAG region and the jurisdictions that make up the SCAG region. The County relied on SCAG's 2012-2035 RTP/SCS growth forecasts at the time the 2014 Master Plan EIR was prepared.

SCAG adopted its current RTP/SCS, "Connect SoCal 2024," in April 2024 and it provides the long-range vision of the SCAG region (SCAG 2024a). Connect SoCal 2024 expands land use and transportation strategies established from previous cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal 2024 contains plans and projections for the region's future. Like other RTP/SCS publications, Connect SoCal 2024 provides a policy framework for preparing local plans and handling issues of regional significance, such as land use and housing, open space and biological habitats, water, energy, air quality, solid waste, transportation, security and emergency preparedness, economy, and education. Connect SoCal 2024 also strives to achieve broader regional objectives, such as encouraging diverse housing construction in areas supported by multiple transportation options; promoting development of complete streets that prioritize safe opportunities to walk, bike, and pursue other forms of active transportation; leveraging new transportation technologies and data-driven solution to efficient travel; and promoting conservation of natural lands. Connect SoCal 2024 advances regional planning by incorporating an integrated approach between SCAG, state and local governments, transportation commissions, resources agencies and conservation groups, the private sector, and the general public.

LOCAL

County of Los Angeles General Plan 2035

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) was adopted in 2015, and several elements have been updated since then, with the most recent update in 2025. The LA County General Plan 2035 serves as an advisory document to provide decision-makers with a policy framework for achievement of the LA County General Plan 2035's stated goals and policies (County of Los Angeles 2015). The LA County General Plan 2035 provides the policy framework for how and where the unincorporated County will grow through the year 2035, while recognizing and celebrating the County's wide diversity of cultures, abundant natural resources, and status as an international economic center. The LA County General Plan 2035 accommodates new housing and jobs in unincorporated areas of the County in anticipation of population growth in the County and the region. The LA County General Plan 2035 included goals, policies, and implementation programs to guide the long-term physical development and conservation of resources in the unincorporated areas of the County.

The housing element was updated separately in 2022 (County of Los Angeles 2022). The most recent housing element was the sixth revision to the County's housing element and covers the planning period of October 2021 through October 2029. As discussed in the housing element, denser and more compact housing types are necessary in unincorporated areas to accommodate the housing needs of the growing senior citizen population; younger individuals who live alone; low-income households; and others who need and/or desire apartments, condominiums, and smaller, more affordable housing units. Table 3.12-1, *Unincorporated County of Los Angeles Regional Housing Needs Allocation: 2021-2029*, identifies the 2021 to 2029 RHNA allocation for unincorporated County of Los Angeles (County of Los Angeles 2022).

Table 3.12-1 Unincorporated County of Los Angeles Regional Housing Needs Allocation: 2021-2029

Household Income Category	Target (Units)
Very-Low Income	25,648
Low Income	13,691
Moderate Income	14,180
Above Moderate Income	36,533
Total	**90,052**

Source: County of Los Angeles 2022.

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City of Los Angeles. The City's

general plan includes several elements, including a housing element, which is a State-mandated general plan element. The housing element was adopted in June 2022 (City of Los Angeles 2022a).

The City of Los Angeles' housing element is a strategy for short-term housing development, establishing a citywide context that guides all housing activities in the city. The primary goal of the housing element is to provide a range of housing opportunities for all income groups. The most recent housing element was adopted on November 21, 2021, and covers the planning period of October 2021 through October 2029. Table 3.12-2, *City of Los Angeles Regional Housing Needs Assessment Targets: 2021-2029*, identifies the 2021 to 2029 RHNA allocation for the City (SCAG 2021).

Table 3.12-2 City of Los Angeles Regional Housing Needs Allocation: 2021-2029

Household Income Category	Target (Units)
Very-Low Income	115,978
Low Income	68,743
Moderate Income	75,091
Above Moderate Income	196,831
Total	**456,643**

Source: SCAG 2021, pg. 1.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan area encompasses the hills and valleys east of the Los Angeles River and north of the Boyle Heights Community Plan area in the City of Los Angeles (City of Los Angeles 1999). The 15,000-acre area contains a diverse collection of communities and neighborhoods, serves as a transition area between the downtown center of the City of Los Angeles and the neighboring cities of Glendale, Pasadena, South Pasadena, and Alhambra to the north and east. The general purpose of the Northeast Los Angeles Community Plan is to preserve and enhance the character of northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities and improving the quality of life for all its residents. More specifically, the plan serves to preserve and enhance the positive characteristics of residential neighborhoods while providing a variety of compatible new housing opportunities. The Northeast Los Angeles Community Plan includes the following objectives that guide housing development:

Objective 1-2. To allocate land for new housing to accommodate a growth of population that is consistent with and promotes health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and government services, especially schools.

Objective 1-6. To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background.

3.12.2 Existing Conditions

The Project Site encompasses approximately 81.9 acres and is entirely within Census Tract 2033 in the City of Los Angeles on County-owned land. The Project Site is fully developed with buildings and structures that support or otherwise are related to the Los Angeles General Medical Center. Aside from some supportive housing related uses associated with the medical uses on the Campus, there is no permanent residential development on-site. The Project Site staffs an estimated 12,850 employees based on SCAG estimates.

SCAG has adopted forecasts regarding the estimated and projected future population, households, and employment opportunities number for Southern California cities in the SCAG region. Table 3.12-3, *SCAG Projected Regional Population, Housing, and Employment Growth*, identifies the projected growth for both the County of Los Angeles and the City of Los Angeles.

Table 3.12-3 SCAG Projected Regional Population, Housing, and Employment Growth

Area	Data Type	2019	2035	% Change	2050	% Change
County of Los Angeles	Population	10,046,000	10,449,000	4%	10,793,000	7%
	Households	3,393,000	3,933,000	15%	4,155,000	22%
	Employment	5,031,000	5,386,000	7%	5,461,000	9%
City of Los Angeles	Population	3,907,200	4,106,429	5%	4,315,861	10%
	Households	1,398,600	1,699,400	22%	1,828,200	30%
	Employment	1,954,000	2,119,800	8%	2,137,700	9%

Source: SCAG 2024b.

Table 3.12-3 provides housing information regarding occupancy rates and types for the City of Los Angeles; the County of Los Angeles; and Census Tracts 2033,[1] 2031, 2032, 2035, 2036.01, 2036.02, 1999, 1991.20, and 2014.02. These Census Tracts encompass the Project Site and extend approximately 1 mile from the Project Site to include adjacent neighborhoods within the Northeast Los Angeles Community Plan Area and Boyle Heights. This area also constitutes the study area identified in the 2014 Master Plan EIR and the cumulative setting for the analysis in Section 3.12.5, *Cumulative Impact Analysis*. Table 3.12-4, *Existing (2020) Regional and Local Housing Characteristics: Occupancy Rate*, summarizes the occupancy rate for the study area during the 2020 Census. Table 3.12-5, *Existing (2020) Regional and Local Housing*

[1] The Project Site is part of Census Tract 2033.

Characteristics: Occupancy Type, summarizes the occupancy type (i.e., owner-occupied versus renter-occupied) for the study area during the 2020 Census.

Table 3.12-4 Existing (2020) Regional and Local Housing Characteristics: Occupancy Rate

Area	Population	Total Units	Occupied Units	Percent	Vacant Units	Percent	Persons per Household
County of Los Angeles	9,663,345	3,675,444	3,454,917	94%	220,527	6%	2.7
City of Los Angeles	3,820,963	1,565,491	1,424,597	93%	140,894	7%	2.5
Study Area							
Census Tract 2033 [1]	2,105	535	514	96%	21	4%	2.9
Census Tract 2031	4,302	1,306	1,267	97%	39	3%	3.4
Census Tract 2032	4,995	1,319	1,266	96%	53	4%	4
Census Tract 2035	2,831	998	928	93%	70	7%	3
Census Tract 2036.01	2,664	854	820	97%	34	3%	3.2
Census Tract 2036.02	1,964	571	554	97%	17	3%	3.5
Census Tract 1999	2,295	902	875	97%	27	3%	2.6
Census Tract 1991.20	3,704	1,136	1,102	97%	34	3%	3
Census Tract 2014.02	4,113	1,458	1,400	96%	58	4%	2.9
Study Area Total	**28,973**	**9,079**	**8,726**	**96%**	**353**	**4%**	**3.3**

Source: Census Reporter 2023.

1. The Project Site is part of Census Tract 2033.

Table 3.12-5 Existing (2020) Regional and Local Housing Characteristics: Occupancy Type

Area	Population	Occupied Units	Owner-Occupied Units	Percent	Renter-Occupied Units	Percent
County of Los Angeles	9,663,345	3,454,917	1,554,713	45%	1,900,204	55%
City of Los Angeles	3,820,963	1,424,597	498,609	35%	925,988	65%
Study Area						
Census Tract 2033 [1]	2,105	514	77	15%	437	85%
Census Tract 2031	4,302	1,267	139	11%	1,128	89%
Census Tract 2032	4,995	1,266	342	27%	924	73%
Census Tract 2035	2,831	928	269	29%	659	71%
Census Tract 2036.01	2,664	820	115	14%	705	86%
Census Tract 2036.02	1,964	554	161	29%	393	71%
Census Tract 1999	2,295	875	158	18%	718	82%
Census Tract 1991.20	3,704	1,102	209	19%	893	81%
Census Tract 2014.02	4,113	1,400	420	30%	980	70%
Study Area Total	**28,973**	**8,726**	**1,890**	**19%**	**6,837**	**78%**

Source: Census Reporter 2025.

1. The Project Site is part of Census Tract 2033.

According to the California Department of Economic Development, at the time this Draft SEIR was prepared, the unemployment rate in the County of Los Angeles was 6.4 percent, and the unemployment rate in the City of Los Angeles was 6.5 percent (EDD 2025).

3.12.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Consistent with the State CEQA Guidelines Appendix G, "Environmental Checklist Form," the Proposed Project would result in a significant impact related to population and housing if it would:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

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

METHODOLOGY

Changes in population, employment, and housing demand are social and economic effects, not environmental effects. According to the State CEQA Guidelines, these effects should be considered in an EIR only to the extent that they create adverse impacts on the physical environment. According to Section 15382 of the State CEQA Guidelines, "an economic or social change by itself shall not be considered a significant effect on the environment."

Because the Project Site is owned by the County but is located within the City of Los Angeles, the study area for the Proposed Project's analysis is the City of Los Angeles. Potential population and employment increases were calculated and compared with existing and projected data for the City of Los Angeles to determine potential Proposed Project impacts. This approach is appropriate because the Proposed Project would primarily serve the residents of the City and has the potential to attract additional people to the City for housing and employment. Therefore, City-level growth projections provide the most relevant context. The analysis presented below also discusses whether the Proposed Project would displace housing and residents, requiring the need for the construction of new housing.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Section 3.12.4*, Project Impact Analysis*, and 3.12.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant population and housing impacts. Table 3.12-6, *Summary of the 2014 Master Plan EIR Population and Housing Impact Conclusions*, provides an overview of the previous population and housing impacts analyses for the Campus.

Table 3.12-6 Summary of the 2014 Master Plan EIR Population and Housing Impacts Conclusions

Environmental Impact[1]	Significance without Mitigation	Mitigation Measure	Significance with Mitigation
POP-1: Would the project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure).	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
POP-2: Would the population displace substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	No Impact (construction and operation)	None	No Impact (construction and operation)
POP-3: Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No Impact (construction and operation)	None	No Impact (construction and operation)

Source: County of Los Angeles 2014.

Notes:

1. Significance criteria are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

3.12.4 Project Impact Analysis

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Construction

The Proposed Project would include development of new residential uses, as well as various non-residential uses. Construction activities would include the demolition of on-site buildings and structures, site preparation and grading, and construction of the new on-site buildings. The number of construction workers employed and working on-site would vary over the course of a

phased construction period and over the lifetime of the Proposed Project (25 years). As previously identified, the County has an unemployment rate of 6.4 percent, and the City has an unemployment rate of 6.5 percent (EDD 2025). The County and City have a large pool of construction labor from which to draw within commuting distance of the Project Site. Additionally, because of the highly specialized nature of most construction projects, construction workers are likely to be employed on the job site only for as long as their skills are needed to complete a specific phase of the construction process. For these reasons, it is reasonable to assume that most construction workers would not relocate their households to work on the Proposed Project. Therefore, construction activities would not induce substantial unplanned population growth in the City, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Proposed Project would include a mix of land uses that could include the development of up to 2,300,000 square feet of residential uses with up to 3,200 residential dwelling units and could result in up to 2,755,300 square feet of non-residential use.[2] These numbers represent the maximum amount of development that could take place on the Project Site; future redevelopment would occur in phases over an estimated 25 years. Table 3.12-7, *Potential Project Population and Employment*, uses the employment generation factors identified in the 2014 Master Plan EIR, City of Los Angeles Department of Transportation population generation rates, and the City's average household size of 2.5 persons per household to estimate the Proposed Project's increase in employment and population at the Project Site (County of Los Angeles 2014; City of Los Angeles 2020; Census Reporter 2023).

[2] Excludes proposed parking.

Table 3.12-7 Potential Project Employment and Population Projections

Use	Generation Factor[1]	Building Size/ Number of Units	Number of People
Residential	2.5 persons per household	2,300,000 sf /3,200 units	8,000
General Office	4.0 employees/1,000 sf	400,000 sf	1,600
Medical Office	3.0 employees/1,000 sf	735,300 sf	2,206
Retail	3.3 employees/1,000 sf	320,000 sf	1,056
Patient and Caregiver	0.5 employee per room	80,000 sf/200 rooms	100
Community Facilities	1.0 employees/1,000 sf	350,000 sf	350
Education	1.0 student/90 sf [2]	110,000 sf	1,222
Education	0.1 employee/classroom	1,222 classrooms	122
Warehouse	0.3 employees/1,000 sf	160,000 sf	48
Clean Tech/Light Industrial	1.0 employee/ 1,000 sf	200,000 sf	200
Hospital	4 employee/bed	400,000 sf /450 beds	1,800
		Subtotal Employees	*7,482*
		Subtotal Residents	*8,000*
		Subtotal Students	*1,222*
		Grand Total (Daytime Population[3])	**16,704**

Notes: sf = square feet

1. For the purposes of analysis, this Draft SEIR uses population generation rates from the United States Census Bureau for the City of Los Angeles and the City of Los Angeles VMT Calculator Documentation (Version 1.3[2020]) (City of Los Angeles 2020).
2. The student generation rate is derived from the proposed Master Plan.
3. Daytime population includes persons anticipated to be physically present on the Project Site during typical operating hours, including permanent residents, employee, and non-resident students. Daytime population is distinct from permanent residential population, which reflects only persons who reside on the Project Site.

As shown in Table 3.12-7, at maximum buildout, the Proposed Project would increase the daytime population at the Project Site by 16,704, consisting of 8,000 residents, 1,222 students, and 7,482 employees. In addition to the 12,850 existing employees on the Project Site, at buildout, the Project Site could have a total daytime population of approximately 29,554 persons.

As shown in Table 3.12-3, SCAG projections anticipate a citywide population growth of 10 percent by 2050 and a citywide employment growth of 9 percent by 2050 (SCAG 2024b). As shown in Table 3.12-8, *Comparison of SCAG Growth Projections and the Proposed Project*, the Proposed Project would contribute approximately 2 percent[3] of the projected population growth for the City of Los Angeles through 2050. Additionally, as estimated, the increase in employment opportunities anticipated on the Proposed Site represents approximately 4

[3] (8,000 population / 408,661 population) x 100 = ~ 2 percent.

percent[4] of the projected employment opportunity growth for the City of Los Angeles. Proposed Project implementation would not cause population to exceed forecasts for the City. Because the Proposed Project's maximum estimated population and employment generation fall well within SCAG forecasts for the City, it would not result in growth beyond that already anticipated in adopted plans and population growth would be accommodated within existing and planned land use patterns and infrastructure systems. Accordingly, the Proposed Project would represent an incremental contribution to planned growth rather than a catalyst for new or unforeseen development.

The Proposed Project would not open new areas for development beyond the Project Site or substantially alter the location, distribution, or intensity of regional growth. While the Proposed Project would introduce new residential units and employment opportunities, these uses are consistent with planned land uses and would not, in themselves, induce additional growth beyond that anticipated in regional forecasts. The Proposed Project would not include features that would facilitate or encourage additional off-site development, such as the extension of major infrastructure into previously undeveloped areas or the provision of substantial excess capacity beyond what is needed to serve the Project Site. The Proposed Project would not remove existing constraints to growth, such as limitations related to infrastructure capacity, land use controls, or access.

Therefore, the Project's incremental effects involving population growth through residential development would not induce substantial unplanned population growth.

Table 3.12-8 Comparison of SCAG Growth Projections and the Proposed Project

	Baseline	2050	Change (Percent)
City of Los Angeles			
Population	3,907,200	4,315,861	408,661 (10%)
Households	1,398,600	1,828,200	429,600 (30%)
Employment	1,954,000	2,137,700	183,700 (9%)
Proposed Project			
Population	0	8,000	8,000 (N/A[1])
Households[2]	0	3,200	3,200 (N/A[1])
Employment	14,367	21,849	7,482 (52%)

1. N/A (percent change cannot be calculated because the baseline condition is zero)
2. For purposes of analysis, it is assumed that all housing units under the Proposed Project would be occupied.

The Project Site is located within a developed and urbanized portion of the City with existing infrastructure in place. The Proposed Project includes infrastructure improvements primarily

[4] (7,482 employees / 183,700 employees) x 100 = ~ 4 percent.

within the boundaries of the Project Site to support the Proposed Project's population and employees. While some off-site connections into larger existing infrastructure systems could occur (i.e., tying into existing water or sewer mains off-site), these off-site improvements would not involve the extension of roads or other infrastructure in undeveloped areas outside the Project Site that would indirectly induce substantial population growth in those areas. Therefore, the Proposed Project would not result in substantial unplanned population growth in the City, and impacts related to population growth generated as a result of the Proposed Project would be **less than significant**. The physical environmental effects of the Proposed Project accommodating residents and an increased employee population on-site are evaluated throughout this Draft SEIR, including in Chapters 3.5, *Energy*; 3.13, *Public Services*; 3.14, *Recreation*; 3.15, *Transportation*; and 3.17, *Utilities and Service Systems.* Mitigation measures are identified where applicable.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction

As previously discussed, all development and facilities proposed under the Proposed Project would be constructed within the existing boundaries of the Project Site. There are no housing units on-site that would be displaced by the Proposed Project. The Proposed Project would not demolish any residential units, including but not limited to rent-stabilized units or supportive housing. Therefore, implementation of the Proposed Project would not displace existing housing and would not result in replacement housing elsewhere. Although the Proposed Project would result in the demolition of existing buildings and features, these buildings and features are underutilized medical-related facilities or vacant. The Proposed Project would not result in the removal of jobs within the Project Site. Impacts would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Under operational conditions, the Proposed Project would result in an increase in employment and residential units on the Project Site through the provision of jobs generated by the various retail, office, and other employment generating uses, and through the provision of up to 3,200 residential units. Operation of the Proposed Project would not require the removal of housing or displacement of residents as there are no housing units on-site and the Project would add residential units. As such, operation of the Proposed Project would not displace a substantial number of existing housing units or people, nor would it necessitate the construction of

replacement housing elsewhere. Therefore, impacts would be **less than significant** related to the displacement of people and housing.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.12.5 Cumulative Impact Analysis

The geographic setting for cumulative growth impacts encompasses the Census Tract that includes the Project Site and the adjacent Census Tracts, as identified in Section 3.12.2 and below. The listed Census Tracts are the same as those identified for the cumulative setting analyzed in the 2014 Master Plan EIR and are appropriate as they include the surrounding neighborhoods within approximately one mile of the Project Site and within the Northeast Los Angeles Community Plan and Boyle Heights neighborhood.

- Census Tract 2033 (Project Site)
- Census Tract 2031
- Census Tract 2032
- Census Tract 2035
- Census Tract 2036.01
- Census Tract 2036.02
- Census Tract 1999
- Census Tract 1991.20
- Census Tract 2014.02

A list of cumulative projects in the Project Site vicinity is provided in Table 3-3, of Chapter 3, *Environmental Analysis*, of this Draft SEIR.

The cumulative projects that are located within the above-listed Census Tracts include Cumulative Project 2 (3880 Mission Project), located within Census Tract 1991.20, Cumulative Project 3 (Boyle Heights Community Plan Update) is in Census Tracts 2032, 2035, 2036.01, and 2036.02, Cumulative Project 7 (USC Discovery and Translation Hub) is in Census Tract 2033, Cumulative Project 9 (2115-2125 East Cesar Chavez Avenue) in Census Tract 2036.01, Cumulative Project 10 (Medical Examiner Crypt Expansion) in Census Tract 2033, Cumulative Project 11 (Medical Examiner Seismic Retrofit) in Census Tract 2033, Cumulative Project 12 (Medical Examiner Deferred Maintenance Repair Project) in Census Tract 2033, and Cumulative Project 13 (RCV Surface Parking Lot) in Census Tract 2033. However, only Cumulative Projects 3 and 9 are anticipated to generate a residential population.

Would the project have a cumulative effect related to population and housing?

UNPLANNED POPULATION GROWTH

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in substantial unplanned population growth during construction. Construction activities associated with the Proposed Project would be temporary and would require a temporary workforce. Construction workers are typically from the local regional labor market and would not induce permanent population growth. As such, the Proposed Project's construction activities are not anticipated to contribute to cumulative impacts. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

As provided in Table 3.12-3, *SCAG Projected Regional Population, Housing, and Employment Growth*, SCAG estimates that the County's population and employment will increase to 10,793,000 residents and 5,461,000 employees and that the City's population and employment will increase to 4,315,861 residents and 2,137,700 employees by 2050 (SCAG 2024b). SCAG projects that the County's population will increase by 7 percent, households will increase by 22 percent, and employment will increase by 9 percent compared to 2019 conditions. SCAG projects that the City's population will increase by 10 percent, households will increase by 30 percent, and employment will increase by 9 percent compared to 2019 conditions.

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in substantial unplanned population growth during operation. The Proposed Project could result in the development of up to 3,200 residential units with approximately 8,000 residents. The Proposed Project would also add up to 2,755,300 square feet of non-residential use, resulting in a direct employment increase of up to 7,482 employees within the Project Site. On a County level, this represents approximately 1 percent[5] of the projected residential population growth and 2 percent[6] of the projected employment growth for the County, and approximately 2 percent of residential growth and 4 percent of employment growth for the City. The potential residential population and employment population resulting from the Proposed Project is within the SCAG employment growth forecasts for both the County and the City.

[5] (8,000 people / 747,000 people) x 100 = ~1 percent
[6] (7,482 employees / 430,000 employees) x 100 = ~2 percent

In addition to consistency with SCAG forecasts, the potential for the Proposed Project, in combination with cumulative projects, to induce growth is evaluated based on whether it would remove constraints to growth or facilitate additional development beyond what is planned. The Proposed Project and related cumulative projects are located within urbanized areas planned for growth and would be served by existing and planned infrastructure. These projects would not require the extension of major infrastructure into previously undeveloped areas or create substantial new capacity beyond that needed to serve approved development. These projects would not remove regulatory or physical constraints, such as limitations related to land use designations, infrastructure capacity, or access, that currently limit growth. Accordingly, the Proposed Project, in combination with cumulative development, would not facilitate or induce additional growth beyond that anticipated in regional forecasts.

At a more local scale, there are two cumulative projects within one mile of the Project Site at different stages of planning and development that are anticipated to generate a residential population. Table 3.12-9, *Proposed Project Plus Cumulative Projects: Population and Housing*, shows the anticipated population and housing growth in the cumulative study area with and without the Proposed Project.

Table 3.12-9 Proposed Project Plus Cumulative Projects: Population and Housing

Scenario	Population	Housing Units
Proposed Project (net new)	8,000[1]	3,200
Cumulative Project 3 (Boyle Heights Community Plan Update)	115,000[2]	33,000
Cumulative Project 9 (2115-2125 East Cesar Chavez Avenue)	125[1]	50
Total Growth (without Proposed Project)	115,125	33,050
Total Growth (with Proposed Project)	**123,125**	**36,250**

Notes:

1. Calculation based on the City's average household size of 2.5 persons per household.
2. Population from the Boyle Height Community Plan Update Draft EIR (City of Los Angeles 2022b)

The Proposed Project's residential use would contribute to the housing supply not only within the City but within the County as well. The Proposed Project in conjunction with cumulative development would represent 30 percent[7] of SCAG's projected population increase for the City of Los Angeles, with most of this increase attributable to Cumulative Project 3 (Boyle Heights Community Plan Update). The Proposed Project, in conjunction with cumulative development,

[7] (123,125 population / 408,661 population) x 100 = ~30 percent

would not exceed regional SCAG projections and would not induce substantial unplanned population growth, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

DISPLACEMENT OF PEOPLE AND HOUSING

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the displacement of people or housing during construction. Cumulative projects may result in the removal of housing units and potential displacement of residents. However, construction of the Proposed Project would occur within the boundaries of the Project Site and would not require demolition or removal of residential units off-site. The Proposed Project's construction activities would not displace existing residents or housing, nor would it displace people in a manner that would require the construction of replacement housing elsewhere. Therefore, the Proposed Project would not contribute to a cumulative impact and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the displacement of people or housing during operation. Cumulative projects may result in the removal of housing units and potential displacement of residents. However, the Proposed Project would result in an increase in on-site housing and employment opportunities. Additionally, the Proposed Project does not include the demolition of residential units on- or off-site. Therefore, the Proposed Project would not displace any people or housing and would not contribute to potential cumulative impacts associated with displacement of people and housing. Thus, the Proposed Project would not make a cumulatively considerable contribution to displacement-related impacts, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.12.6 Comparison to the 2014 Master Plan EIR Impact Analysis

As described in Section 3.12.4, *Project Impact Analysis*, and 3.12.5, *Cumulative Impact Analysis*, the Proposed Project would result in less-than-significant impacts related to substantial unplanned population growth and displacement of people or housing.

A shown in Table 3.12-6,*Summary of the 2014 Master Plan EIR Population and Housing Impact Conclusions*, the 2014 Master Plan EIR concluded that the 2014 Master Plan would result in less-than-significant impacts related to population growth and no impacts related to the displacement of housing and people. The Proposed Project would result in the development of up to 2,300,000 square feet of residential uses with up to 3,200 residential dwelling units and, unlike the 2014 Master Plan, would result in a new residential population on-site. Although the Proposed Project would result in a larger population when compared to the population anticipated under the 2014 Master Plan, the 2014 Master Plan EIR and this Draft SEIR result in the same impact conclusions.

The 2018 amendments to the State CEQA Guidelines revised the significance thresholds for Population and Housing in Appendix G of the State CEQA Guidelines. Significance threshold (a) was clarified to focus on whether a project would induce unplanned population growth that could result in physical environmental effects not previously considered in adopted plans or forecasts. This change was made to acknowledge that population growth, by itself, is not considered an environmental impact under CEQA; the analysis is instead directed at the potential secondary physical effects of such growth (e.g., infrastructure demand, traffic, or land use changes).

At the same time, former significance threshold (c) regarding "inducement of substantial population growth" was removed because it was duplicative and potentially misleading. Population growth is better addressed through plan consistency and through other CEQA resource topics (e.g., Transportation, Utilities, Public Services, and Land Use/Planning).

3.12.7 References

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3.13 PUBLIC SERVICES

This chapter of the Draft SEIR discusses the existing public services provided to the Project Site. This chapter also identifies potential impacts that could result from future development and implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. The analyses presented in this chapter are based on review of publicly available resources.

During the Notice of Preparation (NOP) public review period, which was September 26 to November 21, 2025, comments were received regarding public services impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping meeting comment letters are included in Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. No agencies identified concerns regarding the ability of public service providers to adequately serve the Project Site or existing service populations.

3.13.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

National Fire Protection Association

The National Fire Protection Association Standard 1710 calls for response time targets of four minutes or less for the arrival of the first arriving engine company at a fire suppression incident and eight minutes or less for the deployment of a full crew. It also establishes Emergency Medical Services response times of four minutes or less for a first responder and eight minutes or less for a full company (NFPA 2020).

STATE

California Fire Code

The California Fire Code and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The California Fire Code also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion (ICC 2022).

California Code of Regulations Title 24, Part 2 and Part 9

Part 2 of Title 24 of the California Code of Regulations contains regulations and building standards set forth by State agencies and is referred to as the California Building Code. These regulations and standards include fire and life safety and filed inspection guidelines. Part 9 was updated in 2022 and refers to the California Fire Code, which outline fire safety related building standards (ICC 2022).

Commercial and residential buildings will go through plan check review by local County building officials for compliance with the California Building Code. Typical fire safety requirements of the California Building Code include the installation of sprinklers in all high-rise buildings and other facilities; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction in high fire hazard severity zones; requirements for smoke-detection systems and exiting requirements; and the clearance of debris.

The California Fire Code regulates minimum fire safety regulations for new and existing buildings, facilities, storage, and processes, including emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Mutal Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provide statewide mutual aid between and among local jurisdictions and the State. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed (CalOES 1950).

Senate Bill 50: Leroy F. Greene Schools Facilities Act of 1998

Senate Bill (SB) 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities are inadequate (Justia 2024). Payment of school fees is required by SB 50 for all new residential development projects and is considered full and complete mitigation of impacts to school facilities (Government Code Section 65996). As required by SB 50, school impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional facilities, related furnishings and equipment, and projected capital maintenance requirements. School impact fees and fees collected pursuant to SB 50 are collected at the time when building permits are issued.

Mitigation Fee Act: California Government Code, Section 66000.5

The Mitigation Fee Act complements the Quimby Act by allowing separate impact and recreation facilities fees to be collected so that parks can be improved, and recreation facilities can be maintained. The act allows impact fees to be placed on non-subdivision residential developments (B&S 2021).

Quimby Act

The Quimby Act was enacted in 1975 as an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to require developers of new residential subdivisions to dedicate land, pay in-lieu fees, or both, for the purpose of developing and maintaining park and recreational facilities to serve the new residents (ALP 2025). The act establishes a minimum of three acres of parkland per 1,000 residents. Local parkland includes active, passive, special use, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails.

REGIONAL

California Fire Service and Rescue Emergency Mutual Aid System

The Los Angeles City Fire Department (LAFD) participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan). The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All Cal OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are

beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES (Cal OES 2023).

LOCAL

County of Los Angeles General Plan 2035

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) provides the policy framework for how and where the unincorporated areas will grow through 2035 and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities (County of Los Angeles 2015a). As a County-run facility operated on County-owned land, the Campus is subject to elements of the LA County General Plan 2035.

Chapters 10, 12, and 13 of the LA County General Plan 2035 address Parks and Recreation (County of Los Angeles 2015b), Safety (County of Los Angeles 2025a), and Public Services and Facilities (County of Los Angeles 2015c), respectively. The purpose of Chapter 10, Parks and Recreation Element, is to assess existing park acreage and future recreation needs; identify goals, objectives, and policies for appropriate future actions; and provide recommendations based on needs, goals, and public involvement to guide the future direction of parks and recreation. Chapter 12, Safety Element, identifies the goals and policies that serve to reduce the potential risk of death, injuries, and economic damage resulting from natural and man-made hazards. Chapter 13, Public Services and Facilities Element, provides a summary of the major public services and facilities that serve the unincorporated areas, and establishes policies that guide the provision of public services and facilities in conjunction with projected growth.

- **Policy P/R 1.5.** Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.
- **Policy P/R 1.7.** Ensure adequate staffing, funding, and other resources to maintain satisfactory service levels at all County parks and recreational facilities.
- **Policy P/R 1.10.** Ensure a balance of passive and recreational activities in the development of new park facilities.
- **Policy P/R 3.1.** Acquire and develop local and regional parkland to meet the following County goals: 4 acres of local parkland per 1,000 residents in the unincorporated area and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.
- **Policy P/R 3.8.** Site new parks near schools, libraries, senior centers and other community facilities where possible.
- **Policy S 4.4.** Reduce the risk of wildland fire hazards through meeting minimum State and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.
- **Policy S. 4.5.** Encourage the use of climate-adapted plants that are compatible with the area's natural vegetative habitats.

- **Policy S 4.16.** Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.
- **Policy S 4.17.** Coordinate with agencies, including the Fire Department and ACWM, to ensure that effective fire buffers are maintained through brush clearance and fuel modification around development.
- **Policy S 7.1.** Ensure that residents are protected from the public health consequences of natural of human-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 7.2.** Support County emergency providers in reaching their response time goals.
- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies and health care providers, on emergency planning and response activities, and evacuation planning.
- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- **Policy S 7.7.** Locate essential public facilities, such as hospitals, where feasible, outside of hazard zones identified in the Safety Element to ensure their reliability and accessibility during disasters.
- **Policy PS/F 1.1.** Discourage development in areas without adequate public services and facilities.
- **Policy PS/F 1.3.** Encourage coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 1.4.** Ensure the adequate maintenance of infrastructure.
- **Policy PS/F 7.3.** Encourage adequate facilities for early care and education.
- **Policy PS/F 8.2.** Support library mitigation fees that adequately address the impacts of new development.

County of Los Angeles Code of Ordinances

According to Title 32 (Fire Code) of the County of Los Angeles Code of Ordinances, the Fire Marshal of the County of Los Angeles Fire Department (LACFD), shall be known as the fire code official (County of Los Angeles 2025b). The LACFD is charged with the implementation, administration, and enforcement of provisions of the Fire Code within the jurisdiction of the County. The LACFD is responsible for conducting new construction field inspections, annual, business inspections, and minor plan checks for building, processes and fire extinguishing systems (County of Los Angeles 2025c).

Los Angeles City Fire Department Strategic Plan 2023-2026

The Los Angeles City Fire Department (LAFD) Los Angeles Fire Department Strategic Plan 2023-2026 (Strategic Plan) is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2023-2026 builds upon the progress of the previous Strategic Plan from 2018-2020. As provided in the Strategic Plan 2023-2026, seven goals guide the LAFD for the next three years (LAFD 2023):

1. Deliver exceptional public safety and emergency services;
2. Promote a safe, healthy, and progressive work environment that effectively manages personal and organizational risk;
3. Commit to an organization that embraces diversity, equity, and inclusion;
4. Improve collaboration, participative leadership, and responsible performance management;
5. Foster personal, professional development and organizational succession
6. Explore, implement and integrate technological innovations and advancements; and
7. Enhance community resilience, disaster recovery capabilities, and environmental sustainability.

City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC), contains 20 chapters, including a chapter on fire and police protection, titled Public Safety and Protection (Chapter 5) (City of Los Angeles 2025). Article 2, Police and Special Officers, contains regulations governing administrative issues, such as requirement for police badges and uniform, and Article 7, Fire Protection and Prevention, contains the fire code for the City. The Los Angeles Fire Code prescribes laws that may be enforced by the Los Angeles Fire Department (LAFD) to help safeguard life and property from fire, explosion, panic, or other hazardous conditions that may arise in the City. The fire code includes information pertaining to administrative issues, such as the requirement for filing out and submitting Hazardous Materials Release Response Plan and Inventory Statements and technical requirements associated with the storage, management, and disposal of hazardous materials, such as underground chemical storage tanks, asbestos-containing materials/asbestos-containing building material, and various other combustible and flammable materials.

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), approved by the City of Los Angeles Planning Commission and the mayor and adopted by the City Council, is a comprehensive, long-range declaration of purposes, policies, and programs for development within the City of Los Angeles (City of Los Angeles 1974).

The Safety Element of the General Plan sets forth specific policies and objectives related to safety (City of Los Angeles 2025a). These policies and objectives emphasize hazard mitigation,

emergency response, and disaster recovery. Fire prevention, fire protection, and emergency medical services within the City operate under the Fire Protection and Prevention Plan, which is an element of the general plan. The Fire Protection and Prevention Plan serves as a guide for the construction, maintenance, and operation of fire protection facilities in the city. It sets forth policies and standards for fire station distribution and location, fire suppression water flow (or "fire flow"), fire hydrant standards and location, firefighting equipment access, emergency ambulance services, and fire prevention activities. Population density, nature of on-site land uses, and traffic flow are also considered by the LAFD in evaluating the adequacy of fire protection services for a specific area or land use.

The General Plan also includes a Public Recreation Plan. This element defines the various park types and sets forth guidelines to develop and locate public facilities to provide the greatest benefit to the greatest number of people with the least cost and environmental impact. An overall provision of 10 acres of land per 1,000 persons for total recreational facilities is recommended.

Northeast Los Angeles Community Plan

As part of the City of Los Angeles General Plan, the Northeast Los Angeles Community Plan is one of the 35 community plans that compose its Land Use Element (City of Los Angeles 1999). It was established to encompass the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area in the City of Los Angeles. The 15,000-acre area serves as a transition between the downtown center of Los Angeles and the neighboring cities of Glendale, Pasadena, South Pasadena, and Alhambra to the north and east. The general purpose of the plan is to preserve and enhance the character of northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities and improving the quality of life for all its residents. The plan contains specific goals, objectives, and policies for park and recreational facilities, schools, libraries, police protection, and fire protection to ensure a livable community environment and the adequate provision of services and facilities for its resident population.

3.13.2 Existing Conditions

Public services for the Project Site and surrounding communities are provided by the LAFD, Los Angeles County Sheriff's Department (LASD), Los Angeles Unified School District (LAUSD), City of Los Angeles Public Library (LAPL), County of Los Angeles Fire Department (LACoFD), County of Los Angeles Library (LA County Library), and the City of Los Angeles Department of Recreation and Parks. Public services have been actively developing in to support planned growth in the communities in the region. A discussion of the current provisions to deliver public services to the Project Site and surrounding areas is provided below, along with planning efforts to accommodate the increase in demand due to future growth.

FIRE PROTECTION, PREVENTION, AND EMERGENCY SERVICES

LAFD provides fire protection and prevention and emergency services to and around the Project Site. As the Project Site is owned by the County, LACoFD would provide all building inspections, plan reviews, and related approvals. LACoFD, in conjunction with the County of Los Angeles Board of Supervisors, implement fees to provide Fire Prevention/Life Safety Services including Plan Review, Field Inspections, and Permits (LACoFD 2026).

City of Los Angeles Fire Department (LAFD)

The LAFD is a full-spectrum life-safety agency that serves people who live and work in the City of Los Angeles. LAFD provides services to an approximate 468.7-square-mile service area that has a population of approximately 4,000,000 people, employs approximately 3,510 sworn personnel, and has approximately 392 civilian personnel. The LAFD is organized into 4 bureaus, 14 battalions, and 106 fire stations. The LAFD has the following apparatus: 98 Type I engines, 93 advanced life support ambulances, 43 basic life support ambulances, 43 truck/light forces, 16 brush patrols, 9 airport units, 7 helicopters, 6 urban search and rescue companies, 6 Type III engines, 5 fire boats, 5 mental health therapeutic vans, 5 dozers/loaders, 4 hazardous materials squads, 5 swift water rescue teams, 4 advanced provider response units, 4 fast response vehicles, 4 foam tenders, 1 sobriety emergency response unit, 1 heavy rescue unit, and 1 arson unit (LAFD 2023).

The Project Site is located within the Central Bureau; the Central Bureau consists of 22 fire stations and 645 personnel in Battalions 1, 2, and 11. The Central Bureau encompasses Downtown Los Angeles and the surrounding communities. The surrounding communities include: Angeleno Heights, Boyle Heights, Central City, Civic Center/Bunker Hill, Convention Center, Cypress Park, Eagle Rock, Echo Park, El Sereno, Glassell Park/Atwater Village, Hancock Park, Highland Park/Arroyo, Industrial Eastside, Lincoln Heights, Little Tokyo/Olvera, Newton, Pico-Union/Koreatown, South Boyle Heights, South El Sereno, University Village/USC, West Adams, and Westlake/MacArthur.

Table 3.13-1, *City of Los Angeles Fire Department Fire Stations That Serve the Project Site*, identifies the fire stations and addresses for the LAFD stations that are assigned to the Project Site. The primary responding fire station for the Project Site would be LAFD Fire Station 2 (LAFD 2025a). LAFD Fire Station 2 is located in the community of Boyle Heights and the LAFD Fire Station 1 is located in the community of Lincoln Heights.

Table 3.13-1 City of Los Angeles Fire Department Fire Stations that Serve the Project Site

Facility Number	Address	Straight Line Distance[1]	Driving Distance[2]
Station 1	2230 Pasadena Avenue Los Angeles, CA 90031-2212	1.0 mile	1.9 miles
Station 2	1962 East Cesar E. Chavez Avenue Los Angeles, CA 90031-2212	0.6 mile	1.0 mile

Notes:
1. Distance is measured from property line to property line.
2. Distance is taken from the shortest recommended route provided from Google Earth.
Source: LAFD 2025a.

Table 3.13-2, *City of Los Angeles Fire Department Servicing Fire Station Response Times*, identifies the response times for LAFD Station 1 and Station 2.

Table 3.13-2 City of Los Angeles Fire Department Servicing Fire Station Response Times

Facility Number	Call Type			
	Emergency Medical Service (EMS)	**Non-Emergency Medical Service (NON EMS)**	**Critical Advanced Life Support (ALS)**	**Structure Fire**
Station 1	08:11	08:14	07:05	05:59
Station 2	07:34	07:26	06:25	04:43

Note: All times shown in minutes:seconds.
Source: LAFD 2025b.

For the purposes of analysis, Table 3.13-3, *City of Los Angeles Fire Department Surrounding Fire Stations*, identifies the fire stations that serve the communities (El Sereno, Boyle Heights, Lincoln Heights, Chinatown, and Downtown Los Angeles) surrounding the Project Site.

Table 3.13-3 City of Los Angeles Fire Department Surrounding Fire Stations

Facility Number	**Address**	**Straight Line Distance[1]**	**Driving Distance[2]**
Station 4	450 E Temple Street Los Angeles, CA 90012	1.4 miles	2.1 miles
Station 9	420 East 7th Street Los Angeles, CA 90014-2312	2.3 miles	4.0 miles
Station 16	2011 North Eastern Avenue Los Angeles, CA 90031-3813	1.5 miles	2.4 miles

Table 3.13-3 City of Los Angeles Fire Department Surrounding Fire Stations

Facility Number	Address	Straight Line Distance[1]	Driving Distance[2]
Station 25	2927 Whitter Boulevard Los Angeles, CA 90023-1528	1.7 miles	2.4 miles
Headquarters	200 North Main Street Los Angeles, CA 90021-2932	1.6 miles	2.4 miles
Station 17	1601 South Sata Fe Avenue Los Angeles, CA 90014-2312	2.5 miles	3.5 miles

Notes:

1. Distance is measured from property line to property line.

2. Distance is taken from the shortest recommended route provided from Google Earth.

Source: LAFD 2025a.

According to the Strategic Plan 2023-2026, the top five business stations are stations 9, 64, 11,66, and 57 (LADF 2023).

Under existing conditions, coordination with LAFD is conducted through the LACoFD's County Facilities Unit.

POLICE PROTECTION

The Project Site is located within the service area of the Los Angeles Police Department (LAPD) Hollenbeck Division, which provides primary law enforcement services to the area. The Campus is currently under contract with LASD County Services Bureau (CSB) for patrol services, supplemented by on-site private security personnel. As stated by LASD, it is anticipated that CSB will reduce its long-term involvement in Campus security and planning following the conclusion of the 2028 Olympics. However, LAPD and LASD will continue to provide law enforcement services to the Campus consistent with its jurisdictional responsibilities, and private security services are anticipated to continue supplementing patrol coverage as needed.

Los Angeles County Sheriff's Department

The LASD is headquartered at 211 W. Temple Street, Los Angeles, CA 90012, and maintains 23 stations within its approximately 4,084 square mile service area with a population of 10 million. LASD provides patrol services to unincorporated areas of Los Angeles as well as 42 cities that have contracted policing services (LASD 2026).

The Project Site is in the Hospital Health Services North Zone for LASD (LASD 2023). The LASD CSB provides law enforcement services to the County of Los Angeles Department of Health Services (DHS) and operates a station on the Campus at 2051 Marengo Street. It operates two

radio cars that patrol the campus with two deputies assigned to foot patrol in the emergency room areas off Marengo. The station maintains five squad cars, 15 sworn officers, and oversees an additional 150 non-sworn private security staff, 10 of whom are Sheriff's Security Officers (SSOs)who can detain but not arrest. These personnel operate 24 hours per day in three separate shifts. Each shift includes three deputies and two SSOs that serve on-site County employees, contracted employees, patients and visitors.

The East Los Angeles Sheriff's Station at 5091 E. Third Street, East Los Angeles, is the nearest off-site LASD station to the Project Site (five miles southeast). The East Los Angeles Sheriff's Station services the City of Commerce, City of Cudahy, City of Maywood, Belvedere Gardens, City of Terrace, Eastmont, East Los Angeles, Saybrook Park, and Union Pacific (LASD 2025).

City of Los Angeles Police Department

The City of Los Angeles Police Department (LAPD) provides police protection services for the City of Los Angeles. The nearest LAPD station to the Project Site is the Hollenbeck Community Police Station at 2111 E. 1st Street, Los Angeles, CA 90033. The Hollenbeck Community Police Station is 1.4 driving miles (0.9 mile) south of the Project Site (LAPD 2025a).

The Hollenbeck Community Police Station services an area spanning approximately 15.2 square miles and encompasses the communities of Aliso Village, Boyle Heights, El Sereno, Estrada Court, Hermon, Hillside Village, Lincoln Heights, Montecito Heights, Monterey Hills, Pico Gardens, Ramona Gardens, Rose Hills Courts, and University Hills. The Project Site is in Division 0443 for the station (LAPD 2025a).

Table 3.13-4, *Hollenbeck Service Area Crime Statistics*, provides a summary of recent crimes for the area.

Table 3.13-4 Hollenbeck Service Area Crime Statistics

Crime Type	2024	Year-to-Date 2025	Change
Person Crimes	707	670	-37 (5%)
Property Crimes	3,116	2,786	-330 (11%)

Source: LAPD 2025b.

Private Security

The Project Site is currently served by private security services in conjunction with LASD as described above, which include on-site security personnel and monitoring to manage access and ensure safety of facilities.

SCHOOLS

The Los Angeles Unified School District (LAUSD) and Los Angeles County Office of Education (LACOE) provide facilities and resources for kindergarten through 12th grade education and supplemental programming to the community surrounding the Project Site.

The Los Angeles County Office of Education

The LACOE is a regional provider of services to students within the communities surrounding the Project Site and throughout Los Angeles County. LACOE oversees educational programs and supports 80 local school districts and other agencies with academic, business, administrative, and consulting services related to special education, computer applications, and teaching strategies (LACOE 2025).

Based on the most current data available, the LACOE has an enrollment of approximately 8,642 students (CDE 2025a).

County community schools are operated by LACOE in response to school district needs and serve students from the surrounding area who would normally attend local schools. These schools provide an educational placement for students who are expelled from their regular schools, on probation, experiencing homelessness, or face other issues that affect their ability to succeed in school. Parents or guardians may also request that their child attend a county community school. The LACOE currently operates seven county community schools including the following which are closest to the Project Site (LACOE 2025):

- Boys Republic (Monrovia)
- Mujeres y Hombres Nobles (Monterey Park)
- Jonas Salk (Hawthorne)

Additionally, LACOE operates the IPoly High School on the campus of Cal Poly Pomona with a student population of 500 (IPHS 2025).

Los Angeles Unified School District

The Los Angeles Unified School District (LAUSD) is the nation's second largest school district. LAUSD covers an area totaling 710 square miles, which includes most of the City of Los Angeles and all or portions of 25 cities and unincorporated areas of Los Angeles County. Approximately 4.8 million people live within these boundaries (LAUSD 2025a). Cities entirely within the LAUSD service area include: Gardena, San Fernando, Huntington Park, Vernon, Lomita, West Hollywood, and Maywood. Cities partly within the LAUSD service area include: Bell, Bell Gardens, Beverly Hills, Carson, Commerce, Cudahy, Culver City, Hawthorne, Inglewood, Long Beach, Los Angeles, Lynwood, Montebello, Monterey Park, Rancho Palos Verdes, Santa Clarita, South Gate, and Torrance.

Based on the most current data available, LAUSD has an enrollment of 529,902 students (CDE 2025b). According to the LAUSD Resident School Identifier, the Project Site falls within the service areas for the schools in Table 3.13-5*, LAUSD School Assigned to the Project Site*.

Table 3.13-5 LAUSD School Assigned to the Project Site

School Name	Address	School Type	Enrollment (2024)	Distance[1]
Sheridan Street Elementary	416 N. Cornwell Street Los Angeles, CA 90033	TK-6	534	0.9 miles
El Sereno Middle School	2839 N. Eastern Avenue Los Angeles, CA 90032	7-8	813	3.1 miles
Woodrow Wilson Senior High	4500 Multnomah Street Los Angeles, CA 90032	9-12	1,356	2.0 miles
Abraham Lincoln Senior High	3501 N. Broadway Los Angeles, CA 90031	9-12	942	2.1 miles

Note: TK= Transitional Kindergarten

1. Distance is measured in roadway miles.

Source: LAUSD 2025b.

Table 3.13-6, *Other Surrounding LAUSD Schools*, lists the schools not assigned to the Project Site but within two miles of the Project Site and serve the surrounding communities of El Sereno, Boyle Heights, Lincoln Heights, Chinatown, and Downtown.

Table 3.13-6 Other Surrounding LAUSD Schools

School Name	Address	School Type	Enrollment (2024)	Distance[1]
East Los Angeles Occupational Center	2100 Marengo Street Los Angeles, CA	Short-Term Career & Technical Training	N/A	0.1 miles
Francisco Bravo Medical Magnet High	1200 Cornwell Street, #1417 Los Angeles, CA 90033	9-12	1,562	0.2 miles
Sheridan Street Elementary	416 N Cornwell Street Los Angeles, CA 90033	TK-6	534	0.4 miles
Evergreen Avenue Elementary	2730 Ganahl Street Los Angeles, CA 90033	TK-6	516	0.6 miles
Bridge Street Elementary	605 N. Boyle Avenue Los Angeles	TK-5	178	0.6 miles
Murchison Street Elementary/Early Education Center	1501 Murchison Street Los Angeles, CA 90033	Preschool-5	367	0.7 miles

Table 3.13-6 Other Surrounding LAUSD Schools

School Name	Address	School Type	Enrollment (2024)	Distance[1]
Griffin Avenue Elementary	2025 Griffin Avenue Los Angeles, CA 90031	TK-5	305	0.9 miles
2nd Street Elementary	1942 E 2nd Street Los Angeles, CA 90033	TK-6	202	1.0 mile
Breed Street Elementary	2226 E Third Street Los Angeles, CA 90033	TK-6	270	1.0 mile
1st Street Elementary	2820 E First Street Los Angeles, CA 90033	TK-6	353	1.1 miles
Harrison Street Elementary	3529 City Terrace Drive Los Angeles, CA 90063	TK-5	262	1.1 miles
Malabar Street Elementary	3200 Malabar Street Los Angeles, CA 90063	TK-6	420	1.1 miles
Gates Street Elementary	3333 Manitou Avenue Los Angeles, CA 90031	Preschool-5	461	1.1 miles
Utah Street Elementary	255 Gabriel Carcia Marquesz Street Los Angeles, CA 90033	TK-8	358	1.1 miles
Multnomah Street Elementary	2101 N Indiana Avenue Los Angeles, CA 90032	TK-5	336	1.1 miles
Roosevelt Senior High Science/Tech/Math Magnet	2530 E 4th Street Los Angeles, CA 90033	9-12	1,626	1.2 miles
Albion Street Elementary	322 S Avenue 18 Los Angeles, CA 90031	TK-6	125	1.2 miles
Abraham Lincoln Senior High Science/Tech/Math Magnet	3501 N Broadway Los Angeles, CA 90031	9-12	942	1.2 miles
Pueblo De Los Angeles Continuation High	3921 Selig Place Los Angeles, CA 90031	9-12	91	1.3 miles
Felicitas And Gonzalo Mendez Senior High	1200 Plaza Del Sol Los Angeles, CA 90033	9-12	779	1.3 miles
Boyle Heights Continuation High	544 S Mathews Street Los Angeles, CA 90033	9-12	62	1.3 miles

Table 3.13-6 Other Surrounding LAUSD Schools

School Name	Address	School Type	Enrollment (2024)	Distance[1]
Hollenbeck Middle School	2510 E 6th Street Los Angeles CA, 90023	6-8	1,022	1.4 miles
Eastside Senior High at Hilda L Solis Learning Complex	319 N Humphreys Avenue Los Angeles, CA 90022	9-12	170	1.4 miles
Ann Street Elementary	126 E Bloom Street Los Angeles, CA 90012	TK-5	76	1.5 miles
William R Anton Elementary	831 N Bonnie Beach Place Los Angeles, CA 90063	TK-6	456	1.6 miles
Robert F Kennedy Elementary	4010 E Ramboz Drive Los Angeles, CA 90063	TK-6	176	1.6 miles
Euclid Avenue Elementary	806 Euclid Avenue Los Angeles, CA 90023	TK-5	617	1.7 miles
Ramona Opportunity High School	231 S Alma Avenue Los Angeles 90063	7-12	25	1.8 miles
Soto Street Elementary	1020 S Soto Street Los Angeles, CA 90023	TK-6	205	1.8 miles
Belvedere Elementary	3724 E First Street Los Angeles, CA 90063	TK-5	559	1.8 miles
Belvedere Middle School	312 N Record Avenue Los Angeles, CA 90063	6-8	727	1.8 miles
Sunrise Elementary	2821 E 7th Street Los Angeles, CA 90023	TK-6	376	1.9 miles
City of Angels Independent Studies	221 S Eastman Avenue Los Angeles, CA 90063	K-12	1,180	1.9 miles
City Terrace Elementary	4350 City Terrace Drive Los Angeles, CA 90063	TK-5	332	2.0 miles
El Sereno Middle School	2839 N Eastern Avenue Los Angeles, CA 90032	6-8	813	2.0 miles

Notes:

1. Distance is based on proximity to the address 2051 Marengo Street, Los Angeles, CA 90033 because this address is recognized in the LAUSD system.

Sources: LAUSD 2025b; Dashboard 2025.

Private and Charter Schools

Private and charter schools also serve the communities within and surrounding the Project Site. Enrollment and attendance at private and charter schools are not directly managed by the local public school district. Instead, private and charter schools operate independently of traditional public school districts and often provide alternative educational options for students in the region. Charter schools are publicly funded but managed by independent organizations, and private schools are funded through tuition and private resources. Together, these institutions contribute to the overall education environment by supplementing capacity, offering specialized programs, and serving diverse student populations. Table 3.13-7, *Private and Charter Schools within Two Miles of the Project Site*, lists the local private and charter schools within 2 miles of the Project Site.

Table 3.13-7 Private and Public Charter Schools within Two Miles of the Project Site

School Name	Address	School Type	Enrollment (2024)
PUC Excel Charter Academy/PUC Milagro Charter School	1855 N Main St Floor 1 & 2 Los Angeles, CA 90031	K-8	562
Ednovate – East College Prep	3825 North Mission Road Los Angeles, CA 90031	9-12	332
El Rio Community School	211 South Avenue 20 Los Angeles, CA 90031	K-8	268

Source: Dashboard 2025.

PARKS

Under existing conditions, the Project Site contains one recreational facility: the Wellness Center Park and Fitness Center. The Wellness Center Park and Fitness Center is a two-acre outdoor park and network of fitness trails within the exterior courtyards of the Campus. This is maintained by the County and utilized by on-site employees, patients, and visitors.

The City of Los Angeles Department of Recreation and Parks (LADRP) stewards over 16,000 acres of parkland at 559 park sites. The department also provides a variety of recreational and community services, including early childhood classes, special interest classes, workout classes, adult sports leagues and tournaments, recreation for people with special needs, senior recreation, and fine arts programs (LADRP 2025). The nearest parks serving the Project Site are parks and recreational facilities managed and operated by LADRP. See also Section 3.14, *Recreation*, for more information.

The Project Site is in the Northeast Los Angeles Community Plan area, which is served by four regional parks (refer to Table 3.13-8, *Regional Parks Serving the Northeast Los Angeles Community Plan Area*)—Ernest B. Debs Regional Park, Arroyo Seco Park (Hermon Park), Griffith Park, and Elysian Park. The Ernest B. Debs Regional Park and Arroyo Seco Park are in the Northeast Los Angeles Community Plan area, and the Griffith Park and Elysian Park are immediately adjacent to the Northeast Los Angeles Community Plan area (City of Los Angeles 1999).

Table 3.13-8 Regional Parks Serving the Northeast Los Angeles Community Plan Area

Park Name	Address	Amenities	Distance to Project Site[1]
Ernest B. Debs Regional Park	4235 Monterey Road Los Angeles, CA 90032	Barbecue Pits, Picnic Tables, Bike Path, Hiking Trail, and Pond	2.1 miles
Arroyo Seco Park (Hermon Park)	5566 Via Marisol Los Angeles, CA 90042	Barbecue Pits, Children's Play Area, Picnic Tables, and Tennis Courts (Lighted)	3.2 miles
Griffith Park	4730 Crystal Springs Drive Los Angeles, CA 90027	Children's Play Area, Picnic Tables , Restroom(s), Soccer Field (Lighted), Tennis Courts (Lighted), Tennis Courts (Unlighted), Bike Path, Hiking Trail, and Horseback Riding Trails	6.3 miles
Elysian Park	929 Academy Road, Los Angeles, CA 90012	Bike Path, Hiking Trail, Horseshoe Pits, Jogging Path, and Restroom(s)	1.8 miles

Notes:

1. Distances were derived from Google Earth and are approximate.

Source: City of Los Angeles Department of Recreation and Parks 2025

In addition to these in the vicinity of the Project Site, there are 18 parks and recreational facilities within a mile of the Project Site. Table 3.14-1, *Parks and Recreational Facilities Within One Mile of Project Site*, in Chapter 3.14, *Recreation*, of the Draft SEIR identifies the facilities within a mile of the Project Site.

LIBRARY SERVICES

The City of Los Angeles Public Library (LAPL) maintains the Central Library and its 72 branches and services a population of approximately 4,000,000 people. LAPL operates 3 public libraries within 1 mile of the Project Site. The closest LAPL branch is the Malabar Library at 2801 Wabash Avenue (LAPL 2025). LA County Library also operates public libraries in the region, with 86 libraries and other public resource centers and services a population of approximately 3,400,000 people (LACL 2026). The closest County operated libraries to the Project Site are the City Terrace Library located at 4025 E City Terrace Drive, approximately 1.5 miles southeast, and

the Anthony Quinn Library located at 3965 E Cesar E Chavez Avenue, approximately 1.8 miles southeast. Table 3.13-9, *Public Libraries within Two Miles of the Project Site*, identify the three LAPL branches.

Table 3.13-9 Public Libraries within Two Miles of the Project Site

Branch Name	Address	Distance[1]
City Public Libraries		
Lincoln Heights Branch Library	2530 Workman Street Los Angeles, CA 90031	0.95 mile
Malabar Branch Library	2801 Wabash Avenue Los Angeles, CA 90033	0.61 mile
Benjamin Franklin Branch Library[2]	2200 E. 1st Street Los Angeles, CA 90033	0.90 mile
County Public Libraries		
City Terrace Library	4025 E. City Terrace Drive Los Angeles CA 90063	1.5 miles
Anthony Quinn Library	3965 E. Cesar Chavez Avenue Los Angeles CA 90063	1.8 miles

Notes:

1. Distance is measured from the property line of the main campus.
2. The Benjamin Franklin Branch is undergoing a major renovation project and is closed beginning August 2, 2025, until 2027.

Source: LAPL 2025.

3.13.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XV, states that the Proposed Project would result in a significant impact related to public services if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
   - Fire protection
   - Police protection
   - Schools
   - Parks
   - Other public facilities

METHODOLOGY

The analysis of public services impacts in this section is based on a review of the existing public services facilities on and near the Project Site and identifying public services that might be affected by construction and operation of the facilities that would be developed under the Proposed Project. Information was compiled from regional/local maps and planning documents, and online resources. LACoFD, LAFD, LASD, LAPD, LAPL, and LAUSD were also directly contacted during the scoping period for the NOP. Responses were received from LACoFD, LASD, and LAUSD, all of which were utilized in this analysis. As previously identified, these agencies did not identify concerns related to adequate capacity to serve the Project Site and existing service population during the scoping process for the Proposed Project. The absence of comments from other service providers during the scoping process does not indicate a lack of service capacity concerns; rather, agencies were provided the opportunity to comment pursuant to CEQA, and the analysis herein is based on available service information, adopted standards, existing operational conditions, and projected population growth associated with implementation of the Proposed Project.

The need for or deficiency in adequate provision of public services such as fire, police, parks, schools, and libraries, is not in and of itself a CEQA impact, but rather a social or economic impact. Where a project causes a need for additional public services resulting directly in the need to construct new facilities or modify existing facilities, the construction of those developments could result in a potential impact to the environment, which would need to be

assessed in that specific project's environmental review process. The ultimate determination of the Proposed Project's impacts related to public services in this Draft SEIR focuses on whether the construction of new or expanded public facilities would be a reasonably foreseeable direct or indirect effect of the Project. There are no known current County capital improvement plans for the construction or expansion of public facilities in the Project vicinity. The City of Los Angeles has identified various capital investment programs within the surrounding Boyle Heights Community Plan area, generally located within approximately one to two miles of the Project Site. These projects primarily involve streetscape, lighting, pedestrian safety, and stormwater infrastructure improvements and represent ongoing urban infrastructure investment within the broader vicinity. No improvements to public facilities addressed in this chapter are identified.

This analysis also evaluates the Proposed Project's potential environmental impacts related to public services resulting from construction and operation of the Proposed Project.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future project and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparing with the analysis of the Proposed Project in Section 3.13.4, *Project Impact Analysis*, and 3.13.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant impacts related to the expansion or construction of public services. The 2014 Master Plan EIR determined that the 2014 Master Plan could result in impacts to fire and police protection services and mitigation would be required. However, with the implementation of mitigation, impacts would be reduced to less-than-significant levels. Table 3.13-10, *Summary of the 2014 Master Plan Public Facilities Impact Conclusions*, provides an overview of previous public services impact analysis for the Campus.

Table 3.13-10 Summary of the 2014 Master Plan EIR Public Services Impact Conclusions

Environmental Impact[1]	Significance without Mitigation	Mitigation Measure[2]	Significance with Mitigation
PS-1: Would the proposed Master Plan result in substantial adverse physical impacts associated with the provision of new of physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable services, ratios, response times or other performance objectives for any of the public services?	Potentially Significant (construction) Less Than Significant (operation)	MM-PS-1	Less Than Significant (construction and operation)

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.
2. See Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.13.4 Project Impact Analysis

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

Fire Protection, Prevention, and Emergency Services

This analysis focuses on whether construction and operation of the Proposed Project would increase demand for fire protection services such that new or expanded facilities would be

required, the construction of which could result in environmental impacts. The Campus currently receives fire protection services from LAFD, which would continue to provide fire protection services during construction and operation. Potential impacts related to emergency vehicle access are addressed under impact discussion (d) in Chapter 3.15, *Transportation*, of this Draft SEIR.

Construction

The Proposed Project proposes new development at the Project Site and the adaptive reuse of some existing buildings to remain, including the General Hospital Building. Construction activities resulting from individual development activities under the Proposed Project would be phased over an estimated 25 years and could be overlapping both with other construction activities and/or with operation of other parts of the Campus. Construction activities would be temporary and would include demolition of some existing on-site buildings and structures, site preparation and grading, construction of new structures, and interior renovation activities. These activities would result in an increased population on-site and could involve the use of heavy equipment, temporary electrical systems, welding and cutting equipment, storage of fuels and other combustible materials, and operation of machinery that could generate sparks. As such, construction activities could incrementally increase the potential for fire-related incidents.

The Campus currently receives fire protection services from LAFD, which would continue to provide fire protection services during construction. Construction activities would be required to comply with applicable federal, State, and local regulations intended to minimize fire risk. Compliance with the California Fire Code, California Building Code, and applicable requirements of the LAFD would be required during construction. Contractors would be required to implement standard construction best management practices, including proper storage and handling of flammable materials, maintenance of fire extinguishers on-site, implementation of hot work permitting procedures, and ensuring adequate emergency access and fire flow during all phases of construction.

As discussed in Chapter 3.8, *Hazards and Hazardous Materials*, of this Draft SEIR, construction activities would also comply with applicable regulations governing the safe handling, storage, and disposal of hazardous materials, which would further reduce the potential for fire hazards. These regulatory requirements would minimize the likelihood of construction-related fire incidents. While construction activities could temporarily increase demand for fire protection services, it is unlikely to require new or altered fire protection facilities that could cause significant environmental impacts.

Construction contractors would be required to comply with all applicable fire safety regulations, including California Fire Code and LACoFD requirements related to access, hydrant clearance, fire flow, and temporary water supply. Compliance with these regulatory requirements would

reduce the potential for construction-related fire incidents. While construction activities could result in isolated service calls, such demand would be temporary. Additionally, the Project Site is currently an activated use that presents a similar type of demand in its existing condition. Construction workers would not constitute a permanent population requiring ongoing fire protection services.

Therefore, construction of the Proposed Project would not require the provision of new or physically altered fire station or other fire protection facilities, the construction of which could result in environmental impacts. Because the Project Site is within the existing service area for the LAFD and no changes to fire facilities or service coverage would occur during construction, the Proposed Project would not result in a substantial deterioration of fire response times resulting in the need for new or expanded facilities such that environmental impacts would result. Accordingly, construction-related impacts on fire protection services would be **less than significant**.

Emergency access to the Project Site could be affected by construction. Temporary lane closures and construction-related traffic could delay or obstruct the movement of emergency vehicles, therefore resulting in a potentially **significant impact**.

Impact PS-1: The Proposed Project's construction activities have the potential to result in temporary lane closures and could impair or obstruct the movement of emergency vehicles.

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. With the implementation of Mitigation Measure TRA-1, which would require the development and implementation of a Worksite Traffic Control Plan. The implementation of a Traffic Control Plan would reduce the potential for the Proposed Project's construction activities to impair or obstruct the movement of emergency vehicles. No additional mitigation measures specific to public services are required.

Operation

Service Population

Fire protection services at the Project Site, which contains activated uses in its current condition, are provided by LAFD. Fire protection and emergency response within the greater Los Angeles region operate under mutual aid agreements that allow neighboring fire agencies to provide assistance when needed. Under this system, emergency response resources may be dispatched from the nearest available unit regardless of jurisdictional boundaries. Thus, while the LACoFD serves as the primary agency responsible for plan review and fire protection oversight for the Project Site, coordination with adjacent agencies may occur during emergency response activities consistent with established mutual aid protocols. Coordination with LAFD would be through LACoFD's County Facilities Unit consistent with existing procedures.

Under Proposed Project conditions, LAFD Station 2 would continue to provide fire protection services to the Campus. The Proposed Project would include new development including the introduction of new uses such as residential, commercial, and office uses, and result in an increase in the activity and population present on the Project Site. As shown in Table 3.13-11, *Projected Project Site Service Population at Buildout*, at full buildout, the maximum land uses as part of the Proposed Project could result in up to 29,554 persons. These numbers represent the maximum amount of development that could take place on the Project Site; future redevelopment would occur in phases over an estimated 25 years. The Proposed Project could result in an increase in daytime[1] population at the Project Site by up to 16,704 people consisting of up to 7,482 employees, up to 8,000 residents, and up to 1,222 students. The projected population represents a conservative full buildout scenario used for analytical purposes and reflects a reasonable maximum condition for evaluating impacts. This buildout population reflects the total on-site population increase associated with the Proposed Project's land uses and does not include patients or visitors, which are variable and not quantified for purposes of this analysis. Compared to existing conditions, this represents an increase of approximately 16,704 persons.

Table 3.13-11 Projected Project Site Service Population at Buildout

Category	Existing	Potential Maximum Buildout	Net Increase
Permanent Residents	-	Up to 8,000	Up to 8,000
K-12 Students	-	Up to 1,222	Up to 1,222
Employees	12,850	20,332	7,482
Total		**Up to 29,554**	**16,704**

The Proposed Project would not alter fire station locations, service boundaries, or deployment protocols. However, the increase in development, employment, visitors, and residents on the Project Site would result in an increase in demand for fire protection services. While the Proposed Project would result in a net increase in population of approximately 0.4 percent[2] of the existing service population for LAFD, the Project Site is located within a highly urbanized area that is currently served by established emergency response infrastructure, including LAFD fire stations and a full-service emergency room/hospital. The Project Site is also located within a community that is anticipated to experience continued population and employment growth under adopted regional and local planning projections. Public service providers, including fire protection services, plan and operate based on these long-term growth forecasts rather than

[1] Daytime population includes persons anticipated to be physically present on the Project Site during typical operating hours, including permanent residents, employee, and non-resident students. Daytime population is distinct from permanent residential population, which reflects only persons who reside on the Project Site.

[2] (16,704 people / 4,000,000) x 100 = 0.4%

individual projects alone. As such, growth associated with the Proposed Project would occur within the context of the anticipated development trends, as discussed in Chapter 3.14, *Population and Housing*, and service demand increases would be incremental relative to the broader planned growth in the City. Future development within the Project Site would be subject to applicable building permit review and regulatory requirements at the time of implementation, which may include payment of applicable development-related fees or fulfillment of other requirements intended to support the provision of public services. Such mechanisms are part of standard development review processes and help ensure that service demands are addressed as individual development phases proceed.

Additionally, the Project Site would continue to maintain a dedicated security service with a network of on-site personnel who would work closely with LAFD and serve as the first line of response for on-site emergency services. This could possibly reduce direct calls to LAFD.

Fire/Safety Hazards

As part of the Proposed Project, older vacant, underutilized, and structurally hazardous buildings, some of which pose a public safety concern, would be demolished under the Proposed Project. Moreover, the Proposed Project would include internal circulation improvements to increase access throughout the main campus and with surrounding communities. The removal of vacant and deteriorating buildings would reduce fire and public safety hazards associated with unused structures, such as electrical malfunctions, accumulation of combustible materials, or unauthorized use. Eliminating these potential sources of fire and public safety risk is anticipated to lessen the likelihood of emergency response calls to the Campus.

All future development to be implemented by the Proposed Project would be constructed in accordance with applicable current fire/life/safety ordinance and codes, including all applicable County code requirements related to construction, vehicle access, water mains, fire flows, and hydrants. Additionally, the adaptive reuse of the General Hospital Building would include seismic retrofit and comprehensive modernization of the building, thereby increasing building safety. This would include modernization of fire suppression/alarm systems, ingress/egress pathways, and any required modifications to fire/life-safety systems. All such improvements would be reviewed and approved through the building permit/plan check process to ensure compliance with applicable California Building Code and California Fire Code requirements in effect at the time of construction. Therefore, the Proposed Project would not reduce existing fire protection capabilities. The Proposed Project also includes the relocation of the existing helipad as part of the Proposed Project. The proposed relocated helipad would continue to serve the Medical Center for emergency medical air transport and patient transfer operations, consistent with existing conditions. The replacement would not introduce new aviation uses or expand helicopter operations beyond current levels.

The Proposed Project would be subject to review and approval by the applicable authority having jurisdiction to ensure compliance with all relevant building and fire code requirements. Compliance with these requirements would ensure that adequate fire protection systems are provided as part of Proposed Project implementation.

Emergency Access

The Proposed Project includes modifications to on-site circulation and access as part of redevelopment of the Campus. Emergency vehicle access requirements would be reviewed by LACoFD during project design to ensure compliance with applicable fire code standards related to access width, turning radii, fire lanes, and hydrant spacing. Compliance with these requirements would ensure that adequate emergency access is maintained within the Project Site. See also Chapter 3.15, *Transportation*, for an evaluation of potential impacts related to emergency access. As discussed therein, the Proposed Project would not result in significant deterioration of roadway operations that would materially impede emergency vehicle access.

Fire Summary

The Proposed Project would incrementally increase demand for fire protection due to new development and associated increase in on-site population. The net increase in up to 16,704 people on the Project Site represents approximately 0.4 percent increase in the service population of LAFD. This increase would occur within the entirely urbanized part of the City of Los Angeles and is not anticipated by itself to trigger the need for new or expanded fire facilities, such that environmental impacts would result.

The Project Site has historically functioned as a major institutional and medical campus and would continue to operate within an existing service area already planned for emergency response. Development under the Proposed Project would occur over an estimated 25-year horizon, and the ultimate uses developed over that time, and resulting on-site population, would be variable. Fire agencies, including LAFD, adapt to growth through staffing, facilities planning, and development review processes that would continue to occur outside the scope of the Proposed Project.

The growth projections resulting from the Proposed Project are consistent with regional projections through 2050 (see Chapter 3.14, *Population and Housing*). LAFD anticipates and plans for these growth projections accordingly. Additionally, should LAFD determine at some point in the future that an additional station or expanded station are necessary, that process would be led by LAFD and appropriate environmental review would be conducted at that time. Additionally, each future development activity resulting from the Proposed Project would be subject to applicable fire code requirements at the time of permit issuance, including emergency access, fire flow, hydrant spacing and fire suppression systems.

LAFD was provided with the opportunity to comment during the scoping process consistent with CEQA requirements; however, no comments were received. Accordingly, the analysis relied on available service information, existing conditions, and applicable regulatory requirements to evaluate potential impacts. In addition, the incremental increase in employee and visitor population associated with implementation of the Proposed Project is not anticipated to substantially increase demand for fire protection services. Should LAFD determine in the future that additional facilities or operational changes are warranted, those decisions would occur through separate agency planning processes and would be subject to environmental review, as appropriate.

Because the Project Site would result in incremental growth over a 25-year phased development with an overall amount of growth that is consistent with regional plans, the Proposed Project would not result in a substantial deterioration of fire response times resulting in the direct or indirect need for new fire stations or expansion of existing facilities. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Police Protection

Construction

Potential impacts related to emergency vehicle access are addressed under impact discussion (d) in Chapter 3.15, *Transportation*, of this Draft SEIR. This analysis focuses on whether the Proposed Project would increase demand for police protection services such that new or expanded facilities would be required, the construction of which could result in environmental impacts.

During construction, activities would include demolition, grading, building construction, interior renovations, and utility installation. These activities could involve temporary increases in on-site personnel, delivery vehicles, and construction equipment. Construction sites can present security concerns such as theft of materials or equipment, trespassing, or vandalism. Construction contractors would be required to implement standard site security measures, which may include perimeter fencing, controlled access points, lighting, and security personnel, as appropriate. Compliance with applicable laws and regulations governing construction safety and site management would further reduce the potential for criminal activity.

The Project Site would be protected by fencing, lighting, and privately operated security patrol. Although the Project Site is located within the geographic boundaries of the City of Los Angeles, law enforcement services for the Campus are provided by LASD CSB pursuant to County jurisdiction. As indicated by LASD, their contract may expire in 2028, during a period in which construction activities are anticipated. This is happening irrespective of the Proposed Project.

Contracting responsibility between LASD and LAPD for the long-term future is outside of the scope of this Draft SEIR and is not a major factor in considering whether it is reasonably foreseeable that future construction of new or expanded police protection facilities would be a result of the Proposed Project. As in current conditions and with jurisdictions throughout the region, mutual aid agreements may be implemented in the event of large-scale emergencies; however, mutual aid is intended for extraordinary circumstances and does not represent routine service provision.

In addition, private security currently provides patrolling services in direct coordination with LASD, which would continue during all future phased construction activities. During construction of individual projects, the LASD and private security services would respond to any incidents on-Campus, consistent with existing conditions. Although construction activities could temporarily increase the demand of police protection services, it is unlikely to require new or altered police protection facilities that could cause significant environmental impacts.

Although isolated service calls could occur while construction occurs, any increase in demand would be temporary and would not represent a permanent increase in population requiring ongoing police services. Construction workers do not constitute a long-term service population. The Project Site's existing private security and LASD CSB personnel would be adequate to maintain performance objectives. The Proposed Project's construction impacts are addressed in the relevant chapters (e.g., Air Quality, Greenhouse Gas Emissions, Noise, etc.) of this Draft SEIR, with mitigation measures provided as appropriate. Therefore, construction of the Proposed Project would not require the provision of new or physically altered police facilities, the construction of which could result in environmental impacts. Impacts would be **less than significant**.

Operation

As previously identified, at full buildout, the Proposed Project could result in an increase in the on-site daytime population at the Project Site by approximately 16,704 persons, consisting of up to 7,482 employees, up to 8,000 residents, and up to 1,222 students. The projected population increase represents a conservative full buildout scenario used for analytical purposes and reflects a reasonable maximum condition for evaluating impacts. At buildout, the Project Site could result in a total daytime population of 29,554 persons. This buildout population reflects the total on-site population associated with the Proposed Project's land uses and does not include patients or visitors, which are variable and not quantified for purposes of this analysis. Compared to existing conditions, this would represent an increase of approximately 16,704 persons.

The Project Site currently and has historically functioned as a major institutional and medical campus and would continue to operate within an existing service area already planned for emergency response. Development under the Proposed Project would occur over an estimated

25-year horizon, and the ultimate uses developed over that time, and resulting on-site population, would be variable. Police protection agencies, including LAPD, adapt to growth through staffing, facilities planning, and development review processes that would continue to occur outside the scope of the Proposed Project.

Law enforcement agencies, including the LAPD and LASD, routinely adapt to incremental increases in service demand through staffing adjustments, resource allocation, and development review processes. Similar to fire protection services, the Proposed Project would result in incremental population growth over time; however, this growth would occur within a fully urbanized area and would represent an approximately 0.2 percent[3] increase relative to the broader LASD service population and anticipated regional growth projections (see Chapter 3.14, *Population and Housing*).

As previously identified, Campus security and safety is currently maintained by private security services and LASD CSB provides law enforcement services for both DHS facilities within the Campus and at the Medical Center. Under Proposed Project conditions, private security services and law enforcement services from LASD CSB and/or LAPD would continue to operate on-site to provide monitoring, controlled access, and safety oversight for residents, patients, and visitors. The continued presence of private security and services from LASD CSB/LAPD would reduce demand for routine police service calls, limiting LAPD's role primarily to emergency response and community policing. The Proposed Project would not alter jurisdictional service boundaries, station locations, or deployment protocols.

Although LASD CSB involvement in Campus-specific patrol services may be reduced following the 2028 Olympic Games, the Project Site will remain within the jurisdiction of the LAPD Hollenbeck Station, which will continue to provide primary law enforcement services to the area. In addition, private security services are expected to continue supplementing patrol coverage.

Additionally, the Proposed Project's mix of uses would create active areas within the Campus and increase visibility and natural surveillance within the Campus. By generating consistent foot traffic in open safe spaces, active building frontages, increased lighting, and publicly accessible spaces, the Proposed Project would enhance natural surveillance and visibility across the Project Site, thereby deterring crime and improving campus security. Moreover, the removal of existing vacant buildings would reduce opportunities for unauthorized access, vandalism, and other nuisance activities that require police response. While potential changes in service calls cannot be quantified, the Proposed Project's design features are not anticipated to increase

[3] (16,704 persons / 10,000,000 persons) x 100 = ~0.2%

crime-generating conditions beyond those typical of urban mixed-use development. Law enforcement services would continue to be provided by LASD CSB and on-site private security.

LAPD was provided with the opportunity to comment during the scoping process consistent with CEQA requirements; however, no comments were received. Accordingly, the analysis relied on available service information, existing conditions, and applicable regulatory requirements to evaluate potential impacts. Should LAPD determine in the future that additional facilities or operational changes are warranted, those decisions would occur through separate agency planning processes and would be subject to environmental review, as appropriate.

Accordingly, with the continuation of private security and services from LASD CSB and incremental growth occurring within an existing urban service area the Proposed Project would not create a substantial increase in demand on police protection services associated with the Proposed Project's new residents and development would be minimal and would not require the construction of new or expanded police facilities. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Schools

Construction

Construction activities would occur over a phased process, expected to be implemented over 25 years, and could overlap with both construction and operation of other features. During construction activities, construction workers would be present on-site on a temporary basis for each phase; however, they would not generate school enrollment, as they do not represent permanent residents. Given the large pool of construction workers within commuting distance of the Project Site, it is unlikely that construction workers would choose to permanently relocate their households to the communities around the Project Site, thereby increasing local school enrollment. Additionally, the Proposed Project's construction activities would be temporary, and it is unlikely that the associated construction workers would establish long-term residency in the community surrounding the Project Site. Therefore, the Proposed Project's construction activities are not anticipated to result in the need for new or altered schools or school facilities. The Proposed Project's construction impacts are addressed in the relevant chapters (e.g., Air Quality, Greenhouse Gas Emissions, Noise, etc.) of this Draft SEIR, with mitigation measures provided as appropriate. Impacts would be **less than significant**.

Operation

The Proposed Project would result in an increase in employment, residential, and student populations at the Project Site. As discussed in Chapter 2, *Project Description*, and Chapter 3.12, *Population and Housing*, of this Draft SEIR, residential uses would result in a new on-site

population of up to approximately 8,000 residents. As discussed in Chapter 2, *Project Description*, of this Draft SEIR, the Proposed Project includes an educational use that could serve approximately 1,222 elementary-aged students, based on estimated potential maximum square footage of 110,000 square feet. The on-site education use would directly accommodate the students generated from the proposed residential use and could accommodate off-site students at buildout.

Due to the 25-year buildout horizon of the Proposed Project, the proposed residential use could be developed prior to the proposed educational use. As a result, there is a potential for the Proposed Project to generate students during early phases that would attend the existing schools within the surrounding communities. Additionally, the Proposed Project would generate middle and high school students that would attend the local schools assigned to the Project Site. Any additional demand generated by the Proposed Project would be addressed through compliance with Government Code Section 65996 (SB 50) to mitigate impacts resulting from residual demand on school facilities through payment of fees prior to the issuance of building permits. Pursuant to Government Code Section 65996, payment of such fees constitutes full and complete mitigation for school facility impacts under CEQA. Potential secondary effects associated with increased school enrollment, such as vehicle traffic and associated air quality and noise concerns, are addressed in Chapter 3.2, *Air Quality*; Chapter 3.11, *Noise*; and Chapter 3.15, *Transportation*, of this Draft SEIR. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Parks

Construction

Construction of the Proposed Project would occur within the boundaries of the Project Site and would not involve the use, closure, or physical alternation of off-site public park or recreational facilities. Given the large pool of construction workers in the Los Angeles region that are within commuting distance of the Project Site, it is unlikely that construction workers would choose to permanently relocate their households to the communities around the Project Site, thereby increasing local park usage. Additionally, the Proposed Project's phased construction activities would be temporary, and it is unlikely that the associated construction workers would establish long-term residency in the community surrounding the Project Site. Construction workers may utilize existing off-site recreational facilities during breaks; however, such use would be temporary and dispersed, and would not constitute a substantial increase in demand for park services. The Proposed Project's construction workers would have limited opportunities to use local parks during the workday. Thus, it is not anticipated that the construction workers would result in a substantial increase in demand for local park facilities.

Construction activities would not remove or reduce the availability of existing public parkland or recreational facilities in the surrounding area. Therefore, the Proposed Project's construction activities are not anticipated to result in the need for new or altered park facilities. The Proposed Project's construction impacts are addressed in the relevant chapters (e.g., Air Quality, Greenhouse Gas Emissions, Noise, etc.) of this Draft SEIR, with mitigation measures provided as appropriate. Impacts would be **less than significant**.

Operation

The Proposed Project would result in an increase employment, residents, and students at the Project Site and would attract new visitors to the Campus through activation of new uses such as commercial, office, and community facilities (with such allowable uses as recreational club, riding and hiking trail, parks, etc.; refer to Chapter 3, *Project Description*). The Proposed Project's residential component would result in a new permanent population on-site; as discussed in Chapter 3.12, *Population and Housing* of this Draft SEIR, the Proposed Project could result in up to 8,000 on-site residents. The Proposed Project would include publicly accessible open space, residential amenities, and community facilities, which would provide recreational opportunities for residents and could reduce demand on off-site facilities. While the Proposed Project would result in an increase in population requiring recreational space, such increases would occur over time and within the context of planned regional population growth. The Proposed Project does not identify or require construction of new public park facilities. Accordingly, the Proposed Project would not cause substantial physical deterioration of existing park facilities or require the construction of new or expanded recreational facilities.

The Proposed Project could also result in up to 7,482 employees and 1,222 students if the full buildout of the Proposed Project is realized. However, the future employees and students would have limited opportunities to use local parks during the workday and school day. Additionally, the Proposed Project would include on-site plazas, paseos, and open spaces that would serve the on-site population by providing outdoor amenities.

The Project Site is located within a highly urbanized portion of the City that is served by an established park and recreation system. The Proposed Project would not remove or physically alter existing off-site parkland. The Proposed Project would include on-site open space, public recreational amenities, and amenities for residents. These facilities would provide opportunities for active and passive recreation within the Project Site and would reduce reliance on off-site public parks.

As discussed in Chapter 3.14, *Recreation*, the Proposed Project would comply with the Quimby Act, which would offset demands on public parks and existing parks and recreational facilities are adequate to serve the Proposed Project's population. Therefore, the Proposed Project would not require the development of new or expanded park facilities such that environmental impacts would result. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Libraries

Construction

The Proposed Project's construction activities would be temporary and would result in a temporary increase in on-site workers. While construction workers would utilize existing public library facilities, construction workers would have limited opportunities to use local libraries during the workday while working on the Campus. Therefore, the Proposed Project's construction activities are not anticipated to result in the need for new or altered library facilities. Impacts would be **less than significant**.

Operation

The Proposed Project's anticipated employment population and visitors to the Campus' new uses could result in an increased demand for local library services. However, the increase in demand is not anticipated to be significant given the limited opportunities for employees to use local libraries during the workday. Additionally, the Proposed Project could include development of educational uses that would include on-site academic facilities typical of kindergarten through 12th (e.g., library/media center facilities). As such, students enrolled at the Campus would be served by on-site educational resources, further reducing reliance on the public library system for the school-aged population. Although detailed building programming would be determined at the time of subsequent project approvals, the proposed educational uses are anticipated to include internal academic and learning resource facilities typical of K–12 schools. Accordingly, students would not rely exclusively on public library facilities to meet core educational needs.

The Proposed Project would introduce up to approximately 8,000 residents at full buildout. The increase in residential population may increase the use of existing public library facilities in the surrounding area. Similar to other public service providers, library systems plan for long-term changes in service demand based on anticipated population growth, demographic trends, and resource planning processes. The Proposed Project's projected residential population would represent a 0.2 percent increase[4] in LAPL and LACL service population. Any increase in demand would occur incrementally over time and within the context of regional population growth within the context of broader regional growth projections (see Chapter 3.14, *Population and Housing*). Accordingly, potential increases in demand for library services associated with the Proposed Project would occur incrementally and would be addressed through ongoing library

[4] (8,000 people / 4,000,000) x 100 = 0.2% (LAPL)
(8,000 people / 3,400,000) x 100 = 0.2% (LACL)

system planning, programming, and resource allocation. Therefore, the residential component of the Proposed Project would not result in a substantial increase in demand for library services. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.13.5 Cumulative Impact Analysis

The 2014 Master Plan EIR evaluated cumulative impacts within a two-mile radius of the Project Site. For the purposes of this Draft SEIR, a one-mile radius is identified as the cumulative study area for public services. CEQA does not prescribe a fixed geographic boundary for cumulative analysis; rather, the study area should reflect the geographic scope within which project-related impacts would reasonably contribute to localized demand on the same service providers serving the Project Site.

Fire protection, police services, schools, parks, and libraries are generally provided on a neighborhood or district basis, and emergency response times and service utilization are influenced by proximity. The one-mile radius captures nearby development projects that would reasonably contribute to localized demand on the same service providers serving the Project Site. Expanding the cumulative study area to two miles would not materially alter the analysis or conclusions, as the Proposed Project would remain within existing service boundaries and would not require construction of new or expanded public service facilities. Accordingly, the one-mile radius provides a reasonable and appropriate study area for evaluation of cumulative public service impacts. The full list of 13 cumulative projects is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2*, Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to public services?

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded fire protection facilities, the construction of which could result in environmental impacts. As previously identified, the cumulative study area identified in this chapter is a one-mile radius, which encompasses the following cumulative projects listed in Table 3-2, *List of Cumulative Projects*, 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13).;

these cumulative projects could be constructed during a similar timeframe as the Proposed Project. Construction-related service demands are typically associated with temporary conditions such as equipment use, site security, and worker presence. Construction workers do not represent a permanent service population, and construction activities are required to comply with applicable building codes, fire codes, safety regulations, and emergency access requirements. These regulatory requirements would reduce the potential for incidents requiring emergency response.

However, overlapping construction activities could incrementally increase demand for public services, including fire and police services, within the cumulative study area. Therefore, cumulative impacts could be **significant.**

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

Mitigation: Implement Mitigation Measure TRA-1

Significance with Mitigation: Less than significant. Although cumulative construction activity could result in isolated service calls, such increases would be temporary and would not necessitate construction of new or expanded public service facilities. Additionally, the Proposed Project would implement Mitigation Measure TRA-1, which would require the development and implementation of a Worksite Traffic Control Plan. The implementation of a Traffic Control Plan would reduce the potential for the Proposed Project's construction activities to impair or obstruct the movement of emergency vehicles. No additional mitigation measures specific to public services are required. Therefore, the Proposed Project's contribution to cumulative construction impacts related to public services would not be cumulatively considerable. Construction activities would not remove or physically alter existing off-site parks or library facilities. Temporary construction workers may utilize nearby facilities during breaks; however, such use would be dispersed and temporary and would not result in substantial physical deterioration. With the implementation of mitigation, the Proposed Project's cumulative impacts would be **less than significant**.

Operation

Fire Protection

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded fire protection facilities, the construction of which could result in environmental impacts. Cumulative development in the study area would increase residential, student, and employee populations, resulting in greater overall demand for fire protection

services. Specifically, Cumulative Projects 1, 3, 4, 8, and 9, which include the construction of residential dwelling units, would increase population and generate additional service calls. Additionally, Cumulative Project 3 could allow additional commercial development, potentially increasing future service demand. It should be noted that Cumulative Project 2 is not expected to substantially increase long-term demand for fire services, as it involves industrial/office-related improvements rather than new permanent occupancy.

Population growth could result in a cumulatively significant impact if it were to require construction of new or expanded fire protection facilities. The study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Fire agencies adapt to growth through staffing, facilities planning, and development review processes, and the Proposed Project would incrementally increase demand for fire protection due to new residential and educational uses at the Project Site but would not by itself trigger the need for new or expanded fire facilities. The Proposed Project would also comply with all applicable fire code requirements and be subject to review by the County of Los Angeles Fire Department, ensuring adequate emergency access and safety infrastructure. All cumulative development projects would be required to comply with all applicable fire code requirements and would also be subject to review by the appropriate fire department. Therefore, the Proposed Project's contribution to cumulative fire protection impacts would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Police Protection

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded police facilities. Cumulative development in the study area would increase residential, student, and employee populations, resulting in greater overall demand for police protection services. Specifically, Cumulative Projects 1, 3, 4, 8, and 9, which includes the construction of residential dwelling units, would increase population and generate additional service calls. Additionally, Cumulative Project 3 could allow commercial development, potentially increasing future service demand. It should be noted that Cumulative Project 2 is not expected to substantially increase long-term demand for police protection services, as it involves industrial/office-related improvements rather than new permanent occupancy.

Population growth could result in a cumulatively significant impact if it were to require construction of new or expanded fire protection facilities. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Law enforcement agencies, including the LAPD and LASD, routinely adapt to incremental increases in service demand through staffing adjustments, resource allocation, and development review processes.

The Proposed Project would incrementally increase demand for police protection services due to the introduction of new residents, employees, and visitors. However, the Proposed Project would not, by itself, necessitate new or expanded police protection facilities. The Project Site is currently served by private security and by the LASD CSB for law enforcement needs. With private security continuing to serve the Project Site, the Proposed Project is anticipated to reduce service calls to the LASD CSB and LAPD compared to other developments of similar scale. Other cumulative development projects would be required to comply with the City's development standards and be reviewed by the appropriate law enforcement agencies to ensure adequate safety provisions. Therefore, the Proposed Project's contribution to cumulative police protection impacts would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Schools

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded school facilities. Cumulative growth in the study area would increase student populations and potentially affect the capacities of local serving public schools. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Specifically, Cumulative Projects 1, 3, 4, 8, and 9, which includes the construction of residential dwelling units, would increase population and generate a student population, while Cumulative Project 2 would not directly affect school enrollment.

The Proposed Project would generate students from its residential and educational components, but also includes an on-site elementary school, which could directly accommodate some or all the student demand generated by the Proposed Project. The Proposed Project could generate middle and high school students that would attend the existing school facilities assigned to the Project Site. Any additional demand to these facilities would be addressed through statutory developer school fees as required under SB 50.

Other cumulative development projects in the study area would similarly be required to pay applicable school impact fees under SB 50, which the State has determined provide full mitigation for school facility impacts. Through this regulatory mechanism, cumulative development would contribute its fair share toward accommodating student population growth. The Proposed Project would not contribute to a cumulatively considerable impact on schools. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Parks

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded park facilities. Cumulative growth in the study area would increase local population and potentially affect the park facilities. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Cumulative Projects 1, 3, 4, 8, and 9 would slightly increase local demand for parks and recreational facilities due to new residents. Cumulative Project 2 is not expected to increase park use, as it is related to industrial/office development.

The Proposed Project would generate a new residential population that would result in an incremental increase in demand for park facilities. However, the Proposed Project would include open space, residential amenities, and community benefit space that could offset the increase in demand. Additionally, some of the Proposed Project's open space and community benefit space would be publicly accessible, further supporting local recreational needs. Additionally, the Proposed Project would be required to comply with the Quimby Act to offset demand as well.

Other cumulative development projects in the study area would also be required to comply with the City's parkland dedication and in-lieu fee requirements under the Quimby Act and Los Angeles Municipal Code. Through these requirements, cumulative development would contribute its fair share toward the provision or improvement of park facilities. Therefore, the Proposed Project's contribution would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Other Public Services

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the need for new or expanded library facilities. Cumulative development within the study area would increase population and potentially affect library facilities. As previously identified, the study area is located in a highly urbanized part of the City of Los Angeles, and growth in this area is generally limited to infill redevelopment. Cumulative Projects 1, 3, 4, 8, and 9, could incrementally increase population and therefore library demand. Cumulative Project 2, industrial/office uses, are not expected to increase library demand because a permanent population would not be introduced.

The Proposed Project's residential component would generate an incremental demand for library services, and the proposed educational component would provide its own educational resources.

Other cumulative development projects in the study area would similarly generate incremental demand for library facilities but would be served through ongoing library system planning, resource management, and technological advancements that improve service capacity without requiring new or expanded physical facilities. Therefore, the Proposed Project's contribution would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.13.6 Comparison to the 2014 Master Plan EIR Impact Analysis

Impacts to public services in both 2014 Master Plan EIR, as shown in Table 3.13-9, *Summary of the 2014 Master Plan Public Facilities Impact Conclusions*, and this Draft SEIR for the Proposed Project resulted in similar impact conclusions because both analyses evaluate redevelopment within an already urbanized and fully serviced medical campus that is supported by existing public service infrastructure. While overall land use development densities are higher for the Proposed Project than the 2014 Master Plan (which did not include residential uses), development would occur incrementally within the same established service area and would continue to be served by the same public service providers. As discussed in Section 3.13.4, *Project Impact Analysis*, and 3.13.5, *Cumulative Impact Analysis*, increases in service demand associated with the Proposed Project would occur within the context of anticipated regional growth and established agency planning processes, and would not create a direct or indirect need for construction of new physically altered public service facilities.

As previously stated, the 2014 Master Plan EIR reached similar conclusions. As with the 2014 Master Plan EIR, this Draft SEIR concluded that the Proposed Project could result in potentially significant impacts in related to emergency access for fire and police services. Like the 2014 Master Plan EIR, these impacts would be reduced to a less-than-significant level with mitigation; specifically Mitigation Measure TRA-1. Consistent with the findings from the 2014 Master Plan EIR, this Draft SEIR concludes that no significant and unavoidable impacts related to public services would result from implementation of the Proposed Project. The mitigation measure for public services in the 2014 Master Plan EIR remains applicable to the Proposed Project; however, this mitigation measure is identified in Chapter 3.15, *Transportation*, of this Draft SEIR as this mitigation measure is related to emergency access (Mitigation Measure TRA-1). Appendix B of this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.14 RECREATION

This chapter of the Draft SEIR discusses the potential impacts related to recreation from the implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. This chapter also describes the existing recreational facilities that serve the Project Site and City of Los Angeles, and identifies applicable regulatory requirements.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, comments were received regarding recreational impacts associated with the proposed project. A virtual CEQA scoping meeting was conducted on October 8, 2025, where comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. Comments related to recreation were considered in the preparation of this analysis.

3.14.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

No federal recreational regulations are applicable to the Proposed Project.

STATE

Public Park Preservation Act of 1971

The California Public Park Preservation Act of 1971 provides that no city, county, public district, agency of the state government, or public utility may acquire any real property that is in use as a public park at the time of acquisition, for the purpose of utilizing the property for any non-park purpose, unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both, to enable the operating entity to replace the park land and its facilities. This act authorizes changes in the general character and location of the park if certain requirements are met.

Quimby Act

The Quimby Act was enacted in 1975 as an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to require developers of new residential subdivisions to dedicate land, pay in-lieu fees, or both, for the purpose of developing and maintaining park and recreational facilities to serve the new residents (CA Legislative Information 2015). The act establishes a minimum of three acres of parkland per 1,000 residents. Local parkland includes active, passive, special use, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails.

LOCAL

As the County of Los Angeles is the owner of the Project Site, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The Proposed Project remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's plans, policies, and regulations are provided for informational purposes only.

County of Los Angeles General Plan 2035

The Parks and Recreation element of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) was updated in 2025. The element provides policy direction for the maintenance and expansion of the County's parks and recreation system. The general plan contains guidelines for the major planning areas, with the goal of linking countywide policies to the policies of cities and unincorporated communities. Applicable policies from the parks and recreation element include the following (County of Los Angeles 2025):

- **Policy P/R 1.2.** Provide additional active and passive recreational opportunities based on a community's setting as well as its recreational needs and preferences.
- **Policy P/R 1.3.** Consider emerging trends in parks and recreation when planning new parks and recreational programs.
- **Policy P/R 1.5.** Ensure that County parks and recreational facilities are clean, safe, inviting, usable, and accessible.
- **Policy P/R 1.10.** Ensure a balance of passive and recreational activities in the development of new park facilities.
- **Policy P/R 2.5.** Support the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the County, state, and federal agencies, private groups, schools, private landowners, and other organizations.

- **Policy P/R 3.3.** Provide additional parks in communities with insufficient local parkland, as identified through the gap analysis.
- **Policy P/R 3.4.** Provide additional parks in communities with insufficient local parkland, as identified through the gap analysis
- **Policy P/R 3.8.** Site new parks near schools, libraries, senior centers, and other community facilities, where possible.
- **Policy P/R 4.1.** Create multi-use trails to accommodate all users.
- **Policy P/R 5.7.** Integrate a range of cultural programs into existing activities, and partner with multicultural vendors and organizations.

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan) is composed of chapters (also known as "elements") covering various aspects of the urban environment. The City's general plan includes 11 citywide elements, including the land use element, which is composed of 34 community plans. The framework element is the organizing element that connects all the elements of the General Plan (City of Los Angeles 2001a). The framework element contains goals, objectives, and policies for the provision, management, and conservation of the City of Los Angeles' open space resources. The goals, objectives, and policies address issues related to the outdoor recreational needs of the City's residents. They are also intended to guide amendments to the General Plan's Conservation Element. The following are applicable objectives and policies related to open space and conservation (City of Los Angeles 2001b):

- **Objective 6.2:** Maximize use of the city's existing open space network and recreational facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.
- **Objective 6.4:** Ensure that the city's open spaces contribute positively to the stability and identity of the communities and neighborhoods in which they are located or through which they pass.
    - **Policy 6.4.1.** Encourage and seek to provide usable open space and recreational facilities throughout the city.
    - **Policy 6.4.8.** Maximize use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhood.

The Public Recreation Plan of the General Plan (City of Los Angeles 1980) establishes standards for the City's parks and recreation system in the following three areas:

- The city ensures that sufficient land is reserved for parks and recreation,
- The city ensures an appropriate distribution of park and recreational facilities throughout the city, and

- The city provides a full complement of park and recreational facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users.

Facilities are to be provided at the neighborhood, community, and regional levels and managed by the City of Los Angeles Department of Recreation and Parks (CLADRP) (CLADRP 2009).

- **Neighborhood Parks** provide at least 2 acres of parkland per 1,000 persons within a 0.5-mile service radius. CLADRP tries to locate parks so that users do not have to cross major roadways to access the parks and provides facilities and programs that are tailored to the clientele served.
- **Community Parks** are also under the 2-acres-per-1,000-residents standard. However, the ideal park should contain at least 20 acres, and the facilities or programs offered should reach a larger service radius, which is usually 2 miles. Community parks may offer swimming pools; community buildings; tennis, shuffleboard, and basketball courts; baseball diamonds; or senior citizen facilities.
- **Regional Parks** should have more than 50 acres and provide specialized facilities such as lakes, golf courses, campgrounds, wilderness areas, and museums; they should serve people from beyond the city boundaries.

The Project Site is in the Northeast Los Angeles Community Plan area of the city. The Boyle Heights Community Plan area borders the Project Site on the south. According to the Northeast Los Angeles Community Plan (City of Los Angeles 1999), to provide adequate park and recreational facilities that meet the needs of residents, the following objectives and policies, which are applicable to park and recreational facilities within the vicinity of the Campus, have been adopted:

- **Objective 4-2:** Preserve existing open space resources and, where possible, encourage the acquisition of new open space.
  - **Policy 4-2.1.** Accommodate and promote active use of parklands and open space and promote and preserve greenways.
- **Objective 5-1:** To conserve, expand, maintain, and better utilize existing park and recreational facilities to meet the recreational needs of the community.
  - **Policy 5-1.1.** Preserve the existing recreational facilities and park space.

3.14.2 Existing Conditions

As previously discussed, the Project Site is in the City of Los Angeles but is owned and maintained by the County. Park and recreational facilities in the communities immediately surrounding the Project Site are under the jurisdiction of the CLADRP, which owns and operates public park and recreational facilities throughout the city and administers more than 16,000 acres of parkland at 559 park sites, with 13 lakes, 123 recreation centers, 13 dog parks, 27 skate

parks, 13 golf courses, 59 swimming pools and aquatic centers, and 29 senior centers (CLADRP 2009). Included in these parklands are facilities such as horticulture centers, museums, and historic sites (CLADRP 2009). According to the California State Parks Community Fact Finder, the population within a 0.5-mile radius of the Project Site totals 5,619, and the 24.83 acres of park space equates to 4.42 acres per 1,000 residents (CDPR 2025).

Although the Project Site is in a dense urban area in industrial, commercial, and residential zones, there are 18 parks and recreational facilities within a mile of the Project Site. These locations are identified and described in Table 3.14-1 and Figure 3.14-1, *Parks and Recreational Facilities Within One Mile of Project Site.* The Project Site is not pedestrian oriented. Aside from passive open space areas such as courtyards and landscaped building frontage, there is one recreational facility existing on the Project Site: the Wellness Center Park and Fitness Center. The Wellness Center Park and Fitness Center is a two-acre outdoor park and fitness trail within the exterior courtyards of the Campus (County of Los Angeles 2014).

Table 3.14-1 Parks and Recreational Facilities Within One Mile of Project Site

Park Name	Address	Park Features	Distance from Project Site	Park Type
Wellness Center Park and Fitness Center	1200 N. State Street	Outdoor fitness equipment, playground equipment, interpretive signage, decorative benches and tables, butterfly habitats.	On-site	Local Park
Hazard Park and Recreation Center	2230 Norfolk Street	Auditorium, barbecue pits, basketball courts (lighted/indoor), children's play area, community room, handball courts (unlighted), indoor gym, picnic tables, tennis courts (lighted).	0.04 mile (230 feet) east	Community Park
State Street Recreation Center	716 N. State Street	Auditorium, baseball diamond (lighted), basketball courts (lighted/outdoor), children's play area, community room.	0.25 mile south	Recreation Center
Lincoln Park and Recreation Center	3501 Valley Boulevard	Auditorium, barbecue pits, baseball diamond (lighted), children's play	0.27 mile northeast	Recreation Center

Table 3.14-1 Parks and Recreational Facilities Within One Mile of Project Site

Park Name	Address	Park Features	Distance from Project Site	Park Type
		area, indoor gym, picnic tables, soccer field (unlighted), tennis courts (unlighted), restroom(s), kitchen, lake with fishing, multipurpose sports field, pre-school room, skate park, stage, pool.		
Prospect Park	Echandia Street and Judson Street	Open fields, picnic areas, children's play area.	0.4 mile southwest	Pocket Park
Wabash Recreation Center	2765 Wabash Avenue	Auditorium, basketball courts (lighted/outdoor), children's play area, community room, indoor gym.	0.57 mile southeast	Recreation Center
Ramona Gardens Recreation Center	2830 Lancaster Avenue	Auditorium, baseball diamond (lighted), basketball courts (lighted/indoor, unlighted/outdoor).	0.57 mile east	Recreation Center
Crusado Park	2830 Lancaster Avenue	Basketball courts (unlighted/outdoor), children's play area, picnic tables, soccer field (unlighted).	0.6 mile east	Community Park
Lincoln Heights Recreation Center	2303 Workman Street	Auditorium, basketball courts (lighted/indoor and outdoor), children's play area, community room, indoor gym, kitchen, stage, TV area.	0.6 mile north	Recreation Center
Ross Valencia Community Park	E. 1st Street and Chicago Street	Green space, shade trees.	0.75 mile south	Pocket Park

Table 3.14-1 Parks and Recreational Facilities Within One Mile of Project Site

Park Name	Address	Park Features	Distance from Project Site	Park Type
Ela Park	6000 N Figueroa Street	Picnic tables	0.85 mile north	Pocket Park
Lincoln Heights Youth Center	2911 Altura Street	Recreation center offering judo, boxing, and roller hockey, basketball.	0.8 mile north	Recreation Center
Lincoln Heights Recreation Center	2303 Workman Street	Playground, soccer field, basketball courts.	0.6 mile north	Recreation Center
Downey Playground and Youth Center	1772 N Spring Street	Auditorium, baseball diamond (lighted), children's play area, picnic tables, classrooms, club Room, indoor gym, kitchen, multipurpose sports field, stage.	0.7 mile northwest	Recreation Center
Albion Riverside Park	1739 Albion Street	Multipurpose athletic field, walking and bike paths, fitness zone and equipment, children's play area, picnic area, outdoor amphitheater.	0.7 mile northwest	Community Park
Elysian Park	835 Academy Road	Baseball fields, picnic areas, playgrounds, memorials and scenic views.	1 mile northwest	Regional Park
Hollenbeck Park	415 S St Louis Street	Grassy knolls, picnic areas, playgrounds, skateboard park, man-made lake.	1 mile south	Local Park
Pecan Playground	145 S Pecan Street	Basketball court, seasonal outdoor pool, playground.	1 mile southwest	Recreation Center

Source: County of Los Angeles Enterprise GIS, 2025.

Hazard Park and Lincoln Park, both of which can be accessed from existing surrounding streets, are the closest open space areas to the Project Site (230 feet east and 0.27 mile from the Project Site, respectively). These two parks are also the largest open space areas in the vicinity of the Project Site.

According to the Los Angeles County Department of Parks and Recreation's (LACDPR) Los Angeles 2022 Parks Needs Assessment Plus (PNA+) (the most recent assessment available), the County of Los Angeles maintains a park ratio of 3.3 acres of local parkland per 1,000 residents within the unincorporated area (LACDPR 2022). Countywide, there are 86.2 acres of regional open space and natural areas per 1,000 residents (LACDPR 2016). The County currently exceeds the three acres of parkland per 1,000 residents standard established by the Quimby Act.

Additionally, according to CLADRP's 2009 Citywide Community Needs Assessment (the most recent assessment available), the City of Los Angeles maintains a park ratio of approximately 9.7 acres of parkland per 1,000 residents (CLADRP 2009). The City currently exceeds the three acres of parkland per 1,000 residents standard established by the Quimby Act.

3.14.3 Standards for Analysis

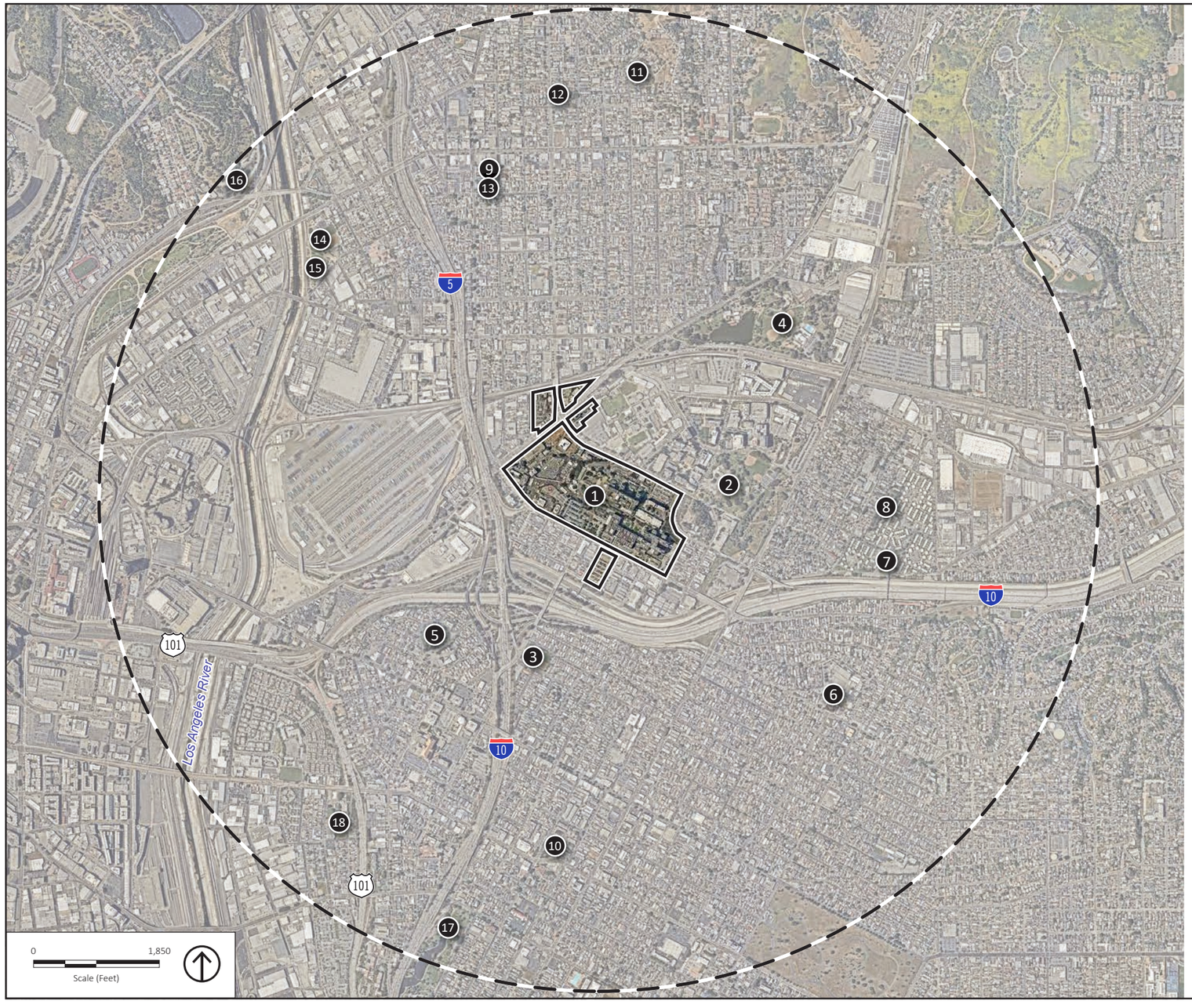
SIGNIFICANCE THRESHOLDS

Appendix G, Section XVI, "Environmental Checklist Form," of the State CEQA Guidelines states that the proposed project would result in a significant impact related to recreation if it would:

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

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Figure 3.14-1 - Parks and Recreation Facilities within 1 Mile of the Project Site



Project Site Boundary

1-Mile Radius from Project Site Boundary

Parks and Recreation Facilities

1. Wellness Center Park and Fitness Center
2. Hazard Park and Recreation Center
3. State Street Recreation Center
4. Lincoln Park and Recreation Center
5. Prospect Park
6. Wabash Recreation Center
7. Ramona Gardens Recreation Center
8. Crusado Park
9. Lincoln Heights Recreation Center
10. Ross Valencia Community Park
11. Ela Park
12. Lincoln Heights Youth Center
13. Lincoln Heights Recreation Center
14. Downey Playground and Youth Center
15. Albion Riverside Park
16. Elysian Park
17. Hollenbeck Park
18. Pecan Playground

Source: Nearmap 2025.

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METHODOLOGY

The analysis of recreational impacts in this section is based on a review of the existing facilities within one mile of the Project Site and identifying recreational uses that might be affected by construction and operation of the facilities that would be developed under the Proposed Project. A one-mile radius study area is used to evaluate potential impacts to recreational facilities because it reflects the typical service area of neighborhood and community parks. Information was compiled from regional/local maps and planning documents, including the Los Angeles County General Plan, City of Los Angeles General Plan, Boyle Heights Community Plan, and the Northeast Los Angeles Community Plan, which were reviewed to provide insight into recreational goals and regulations for the surrounding community.

The Public Recreation Plan of the City of Los Angeles General Plan identifies a goal of four acres of parkland per 1,000 residents (City of Los Angeles 1980). The County uses a goal of four acres of local parkland per 1,000 residents in unincorporated areas and six acres of regional parkland per 1,000 residents of the entire county, as established in the parks and recreation element of the LA County General Plan 2035; this is above the Quimby Act standard that requires a minimum of three acres of parkland per 1,000 residents. Local parkland includes active, passive, special use, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails (LACDPR 2016). Although the Quimby Act (California Government Code Sections 66477–66477.17) formally applies to residential subdivisions, because the Project Site is in the City of Los Angeles, an incorporated city in Los Angeles County, the Quimby Act requirements serve as an appropriate standard for evaluating local parkland dedication for the Proposed Project, whereas the City and County's ratio of four acres functions as a long-range planning goal rather than a project-level requirement. This analysis evaluates the Proposed Project's consistency with applicable City and County plans and policies related to recreation as well as any potential impacts resulting from construction and operation of the Proposed Project.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparison with the analysis of the Proposed Project in Sections 3.14.4, *Project Impact Analysis*, and 3.14.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant recreational impacts related to the deterioration of existing neighborhood and regional parks or other recreational facilities. The 2014 Master Plan would result in significant and unavoidable impacts with mitigation related to the construction or expansion of recreational facilities due to impacts on air quality, noise, and traffic. Table 3.14-2, *Summary of the 2014 Master Plan EIR*

Recreation Impact Conclusions, provides an overview of previous recreation impact analyses for the Campus.

Table 3.14-2 Summary of the 2014 Master Plan EIR Recreation Impact Conclusions

Environmental Impact[1]	Significance without Mitigation	Mitigation Measure[2]	Significance with Mitigation
REC-1: Would the proposed Master Plan increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
REC-2: Would the proposed Master Plan include recreational facilities or require the construction or expansion of recreational facilities that would have a substantial adverse physical effect on the environment?	Potentially Significant (construction and operation)	MM-AQ-1, MM-AQ-2, MM-AQ-3 (reduce construction emissions) MM-NOI-5 (noise from outdoor events)	Significant and Unavoidable (construction) Less Than Significant (operation)

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.14.4 Project Impact Analysis

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

Construction

Construction of the Proposed Project anticipates a number of construction workers on the Project Site in phases over an estimated 25 years. The nearest off-site park to the Project Site is the Hazard Park and Recreation Center, approximately 0.04 mile (230 feet) east of the Project Site. As identified in Chapter 3.12, *Population and Housing*, the County has an unemployment rate of 6.4 percent, and the City has an unemployment rate of 6.5 percent. The County and City have a large pool of construction labor from which to draw within commuting distance of the Project Site. Given the accessibility of the Project Site and availability of construction workers from the Los Angeles region, it is unlikely that a substantial numbers of construction workers would relocate to the immediate vicinity of the Project Site such that use of existing parks or recreational facilities would increase to the point that it would cause substantial deterioration. Construction workers may visit the nearby parks during lunch or for recreational activities after work, but such use would be nominal and on a temporary basis. Any increase in park use by construction workers would not be expected to result in physical deterioration of park facilities because the construction workforce would fluctuate over time and would represent a small, temporary addition to the existing park user population. Moreover, the types of activities typically undertaken by construction workers during short breaks (e.g., passive recreation or eating lunch) would not reasonably be expected to result in physical changes to park facilities or accelerate wear beyond typical maintenance conditions.

Construction activities in and of themselves would not significantly affect parks or recreational facilities surrounding the Project Site. Users of Hazard Recreation Center, the closest park to the Project Site, would likely notice construction activities on the Project Site. Noticeable impacts to park users would include noise, dust, and traffic disruptions; however, none of these disruptions would result in permanent physical deterioration at Hazard Park or any of the other parks or recreational facilities listed in Table 3.14-1. Therefore, construction-related impacts to park use would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Under the Proposed Project, resident, visitor, and employee populations on the Project Site are anticipated to increase. As discussed in Chapter 3.12, *Population and Housing*, of this Draft SEIR, the Proposed Project has the potential to result in an increase in the on-site population by up to

16,704 persons, consisting of up to 8,000 new residents, 1,222 new students, and 7,482 new employees, over the next 25 years. As discussed in Chapter 3.12, *Population and Housing*, of this Draft SEIR, the Project Site currently staffs an estimated 12,850 employees. Therefore, at buildout, the Project Site could result in a total population of 29,554 persons. [1] These numbers represent the maximum amount of development that could take place on the Project Site; future redevelopment would occur in phases over an estimated 25 years. An increase in on-site visitation is expected and would vary throughout the life of the Project. This increase in on-site daytime and residential population is expected to increase the use of nearby parks and recreational facilities, particularly from the residential population. The usage of nearby recreational facilities by on-site employees would likely be sporadic and nominal, given that employees would have limited leisure time while at the Project Site. It is unlikely that the visitor population would result in a noticeable increase in the usage of recreational facilities.

The Proposed Project includes the development of a minimum of ten percent of the building footprint within the parts of the Project Site governed by the Master Plan with a balance of publicly accessible and private (residential) open space. The Forecourt would remain as the primary space for large-scale events and daily community use (markets, movie nights, performances). Courtyards, pocket parks, edible community gardens, exercise stations, pocket parks, pollinator habitats, shaded rest zones, and rooftop gardens would be located throughout the Project Site. Private open spaces would be integrated into future residential development to include but not limited to rooftop amenities, dedicated residential fitness facilities, pool/fitness courts, balconies, and recreation rooms to provide a variety of accessible outdoor experiences for the on-site population. The Proposed Project would include up to 350,000 square feet of community facilities uses throughout the Project Site. Permitted community facilities uses would include community gardens, farming, auditoriums and event spaces, museums, adult continuing education (business, trade/extension school, and professional), health clubs, gymnasium, parks, recreational clubs, riding and hiking trails, sauna and steam baths, swimming pools, kitchens and commissary kitchens (including street vendors), and day care facilities. Portions of the Proposed Project's recreational facilities would be publicly accessible and could reduce demand on existing surrounding parks.

Although the Proposed Project would not be required to adhere to the City's local policies and regulations related to recreational facilities, the addition of the on-site recreational facilities would contribute to the City's parkland ratio. The Proposed Project would be consistent with the goals and objectives outlined in the LA County General Plan 2035 for local parkland, as well as the local parkland ratio standards of the Public Recreation Plan in the City of Los Angeles General Plan (see Section 3.14.1, *Regulatory Framework*).

[1] Excludes proposed parking.

With respect to regional parkland, the Proposed Project would not introduce new regional parks to the City or County; however, the Proposed Project would introduce new residents to the Project Site. Although the Proposed Project could introduce new residents to the City and within the County overall, the Proposed Project would make a nominal impact on the County and City's parkland ratio because the Proposed Project's population increase represents approximately 1 percent of the County's projected growth and 2 percent of the City's projected growth, as anticipated by the Southern California Association of Governments (SCAG) (see Chapter 3.12, *Population and Housing*). In addition, the Proposed Project would add private open spaces such as rooftop amenities, fitness facilities, pool/fitness courts, and recreation rooms, which would help to offset the demand for recreational facilities resulting from the potential population increase. These on-site amenities would provide residents with opportunities for active and passive recreation within the Project Site, thereby reducing reliance on nearby public parks and recreational facilities.

New residents on the Project Site may utilize off-site facilities if certain preferred amenities are not available on-site. However, due to the provision of on-site facilities, it is not expected that the projected growth in resident, visitor, and employee populations on-site would result in a significant increase in the use of existing local parks or substantial physical deterioration of park facilities. Additionally, because the Project Site is located within the City of Los Angeles, and consistent with U.S. Census Bureau commuting data, the increase in the number of households associated with increased on-campus employee populations would most likely be dispersed over a wide geographic area within commuting distance of the campus (U.S. Census Bureau 2026). Therefore, a concentrated or substantially intensified use of local parks is unlikely, and operational impacts related to the use of nearby recreational facilities would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction

Construction of the proposed landscaped and open areas would involve site preparation activities, including demolition, grading and excavation, and construction of permanent facilities. Staging for construction equipment and activities would not occur within any off-campus parkland or recreational facility. These activities would be limited to the Project Site and would not restrict access to nearby off-campus recreational facilities. Temporary lane closures from construction activities could temporarily obstruct or detour access to off-site facilities. These would be limited to the duration of the construction period (see Chapter 3.15,

Transportation) and would be subject to review and approval by the City and County for traffic control, permitting, and emergency access coordination. Standard construction practices, including signage, flaggers, and detour plans, would ensure that temporary closures or detours do not result in long-term or permanent loss of access to off-site recreational areas.

The physical environmental effects of the Proposed Project's construction activities are evaluated under the relevant topical chapters of this Draft SEIR, including Chapters 3.2, *Air Quality* and 3.11, *Noise*. The Proposed Project would not require the construction or expansion of recreational facilities beyond what is evaluated in this Draft SEIR. Construction-related impacts associated with development of on-site recreational facilities would be similar in nature those analyzed for the overall Proposed Project construction activities, including temporary impacts related to air quality and noise. As discussed in the applicable resource chapters, mitigation measures have been identified to reduce these impacts where feasible, and construction activities would be subject to standard regulatory requirements and best management practices. As discussed throughout this Draft SEIR, construction activities could result in noise and air quality impacts on nearby sensitive receptors, including local residents, hospital patrons, or possibly users of local park and recreational facilities. As discussed in Chapter 3.11, *Noise*, of this Draft SEIR, construction noise impacts would be significant and unavoidable only in the event that pile driving is required for specific Proposed Project components. If pile driving were required as part of the overall Proposed Project construction, the proposed recreational facilities would contribute incrementally to the significant and unavoidable construction noise impacts identified in Chapter 3.11. No additional recreation-specific mitigation is required for operation of the Proposed Project. Therefore, impacts are potentially **significant.**

Impact REC-1: Construction of recreational facilities would potentially have an adverse effect on air quality, noise, and traffic.

> **Mitigation:** Implement Mitigation Measures AIR-1a through AIR-1b and NOI-1 and NOI-4.

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

Operation

The Proposed Project would introduce a new land use (residential) to the Project Site that would generate a demand for recreational facilities. However, the Proposed Project includes additional open space and recreational areas that are intended to encourage outdoor recreation, increase mobility, facilitate access to and through the Project Site, and promote a sense of community through a "healthy village" concept. All recreational facilities are located within previously developed or disturbed areas of the Project Site. No natural habitats or environmentally sensitive areas would be disturbed during operation of the Proposed Project. During operation, the proposed open space areas could be used for organized outdoor events, which have the potential to result in impacts on ambient noise levels. Impacts would be potentially **significant**.

Impact REC-2: Operation of recreational facilities would potentially have an adverse related noise generated from organized outdoor events.

Mitigation: Implement Mitigation Measure NOI-3b.

Significance with Mitigation: Less than significant. As discussed in Chapter 3.11, *Noise*, mitigation measure MM-NOI-3b, which requires that the Project Applicant retain an acoustical consultant to evaluate the design and operational event details to ensure that such events comply with applicable noise standards, would reduce potential operational noise impacts due to outdoor events to less-than-significant levels. No additional recreation-specific mitigation is required for operation of the Proposed Project. With the implementation of mitigation, impacts would be less than significant.

3.14.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative recreation impacts is a one-mile radius around the Project Site. Cumulative projects within a one-mile radius around the Project Site include the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). The full list of 13 cumulative projects applicable to the Proposed Project's cumulative analyses is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to recreation?

PHYSICAL DETERIORATION OF RECREATIONAL FACILITIES

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the physical deterioration of recreational facilities during construction. Construction of the Proposed Project, including on-site recreational facilities, would occur within the boundaries of the Project Site. Construction activities would not remove existing public recreational facilities or restrict public access to off-site parks. While construction activities may temporarily increase traffic or noise level, such effects would not result in the physical deterioration of recreational facilities. Additionally, the Proposed Project's construction activities would not result in a permanent increase in a population requiring recreational facilities. Other cumulative projects in the study area would similarly involve temporary construction activities; however, such activities would not result in the degradation or deterioration of existing recreational facilities. The Proposed Project's construction activities would not contribute to a cumulative impact. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in the physical deterioration of recreational facilities during operation. The projects identified in Chapter 3 that are within the geographical study area consists of the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). Specifically, Cumulative Projects 1, 3, 4, 8, and 9 would increase the residential and employee populations in the vicinity of the Project Site, which, as a result, could increase use of and demand for recreational areas and facilities. However, residential subdivisions proposed within the City of Los Angeles are required to provide local park space to serve their respective populations, pay a fee in lieu of the provision of such parkland, or do a combination of both in accordance with the local ordinance in the City of Los Angeles Municipal Code (LAMC), which would reduce cumulative impacts on park and recreational facilities resulting from residential development in the City of Los Angeles. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

EXPANSION OR CONSTRUCTION OF RECREATIONAL FACILITIES

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in expansion or construction of recreational facilities, which might have an adverse physical effect on the environment, during construction. Because the Proposed Project would create additional open space and recreational space on the Project Site that could be used by residents, visitors, employees, and local community residents, the Proposed Project and nearby cumulative projects would not result in significant cumulative impacts on local City recreational and park resources. However, the construction of the proposed open space improvements could result in potentially significant construction noise impacts after mitigation that would affect local sensitive receptors. Construction noise is temporary and localized, and overlapping construction schedules with the cumulative projects could result in short-term increases in noise at shared receptors. Because noise impacts related to the construction of recreational facilities under the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. The Proposed Project's unavoidable construction impacts, which would be phased over a 25-year period, could overlap with other future projects not currently known. This would contribute directly to an overall cumulative effect. Therefore, construction of the proposed open space areas could contribute to significant cumulative noise impacts on sensitive receptors, and impacts would be **significant**.

Impact REC-3: The Proposed Project, together with cumulative projects, would have a substantial construction impact on recreational facilities related to increases in ambient noise.

> **Mitigation:** Implement Mitigation Measures AIR-1a through AIR-1b and NOI-1 and NOI-4.

Significance with Mitigation: Significant and unavoidable. The Proposed Project would result in significant and unavoidable construction-related effects on the environment with respect to noise, which cannot be fully mitigated, as detailed in that technical analysis. Mitigation measures are applied to reduce the impacts to the extent feasible.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in expansion or construction of recreational facilities, which might have an adverse physical effect on the environment, during operation. Operation of the Proposed Project would increase on-site

residential population and associated demand for recreational facilities. However, the Proposed Project's residential development is consistent with regional and local growth projections and planning assumptions. Additionally, the Proposed Project would include on-site recreational facilities designed to serve visitors and residents. During operation, the proposed open space areas could be used for organized outdoor events, which have the potential to result in impacts on ambient noise levels. Impacts would be potentially **significant**.

Impact REC-4: The Proposed Project, together with cumulative projects, would have the potential to result in impacts on ambient noise generated from organized outdoor events during operation.

Mitigation: Implement Mitigation Measure NOI-3b.

Significance with Mitigation: Less than significant. The Proposed Project would not result in demand for new or expanded off-site recreational facilities beyond what is anticipated in regional planning document because cumulative development in the area is planned to accommodate projected growth. However, the Proposed Project's operation could result in organized outdoor event that could impact the ambient noise levels. As discussed, the Proposed Project would implement Mitigation Measure NOI-3b, which requires that the Project Applicant retain an acoustical consultant to ensure that noise from organized outdoor events comply with applicable noise standards. No additional recreation-specific mitigation is required. Therefore, with the implementation of mitigation, the Proposed Project contribution to cumulative impacts would not be cumulatively considerable. Therefore, with the implementation of mitigation, cumulative impacts would be **less than significant**.

3.14.6 Comparison to the 2014 Master Plan EIR Analysis

While overall land use development densities are higher for the Proposed Project than the 2014 Master Plan (which did not include residential uses), development would occur incrementally within the same established service area and would continue to be served by the same recreational facilities. As described in Section 3.14.4, *Project Impact Analysis*, and 3.14.5, *Cumulative Impact Analysis*, the Proposed Project would result in less-than-significant impacts related to the deterioration and use of existing parks or other recreational facilities, significant and unavoidable impacts to construction-related effects on the environment with respect to noise, and significant and unavoidable cumulative construction-related impacts.

As shown in Table 3.14-2, *Summary of the 2014 Master Plan EIR Recreation Impact Conclusions*, the 2014 Master Plan EIR concluded that the 2014 Master Plan would not result in significant recreational impacts related to the deterioration of existing neighborhood and regional parks or other recreational facilities, and would result in significant and unavoidable impacts associated with construction impacts on air quality, noise, and traffic. Appendix B, *Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, lists

the mitigation measures of the 2014 Master Plan EIR side by side with the mitigation measures in this SEIR for comparative purposes.

3.14.7 References

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3.15 TRANSPORTATION

This chapter of the Draft SEIR discusses existing ground transportation conditions related to the Proposed Project. In addition, this chapter analyzes the potential impacts on ground transportation that could result from future development and implementation of the Proposed Project and discusses any necessary mitigation measures that can be applied to reduce impacts below threshold criteria.

During the Notice of Preparation (NOP) public review period, which was September 26 to November 21, 2025, comments were received regarding transportation impacts associated with the Proposed Project. A CEQA scoping meeting was conducted on October 7, 2025, where comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. Comments related to transportation were considered in the preparation of this analysis.

3.15.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Americans With Disabilities Act (ADA) of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

STATE

Assembly Bill 32, Global Warming Solutions Act

Assembly Bill 32 (AB 32), or the Global Warming Solutions Act, was signed into law on September 27, 2006. AB 32 established a comprehensive program to reduce greenhouse gas (GHG) emissions to combat climate change. This bill requires the California Air Resources Board (CARB) to develop regulations that reduce GHG emissions to 1990 levels by 2020. On January 1, 2012, the GHG rules and market mechanisms, adopted by CARB, took effect, and became legally enforceable. The reduction goal for 2020 is to reduce GHG emissions by 25 percent of the current rate to meet 1990s levels, and a reduction of 80 percent of current rates by 2050. The AB 32 Scoping Plan contains the main strategies California will use to reduce greenhouse gases. The Scoping Plan has a range of greenhouse gas reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, and an AB 32 program implementation regulation for funding. In 2016, the Legislature passed Senate Bill 32 (SB 32), which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels.

Senate Bill 375 (Sustainable Communities and Climate Protection Act)

Senate Bill 375 (SB 375) or the Sustainable Communities and Climate Protection Act, provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet statewide targets for reducing greenhouse gas emissions set by AB 32. SB 375 requires each MPO to adopt a broader vision for growth to its transportation plan—called a Sustainable Communities Strategy (SCS). The SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions. The SCS should integrate transportation, land use, and housing policies to plan for the achievement of the emissions target for each region. The Southern California Association of Governments (SCAG) established its most recent SCS with the adoption of Connect SoCal in 2024.

Senate Bill 743, Transportation Impacts

To further the state's commitment to the goals of Senate Bill (SB) 375, Assembly Bill (AB) 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, *Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13* (Section 21099) of the Public Resources Code. Key provisions of SB 743 include eliminating the measurement of vehicle delay (level of service [LOS]), as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to the reduction of greenhouse gas (GHG) emissions through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce Vehicle Miles Traveled (VMT). SB 743 required the Governor's Office of Land Use and Climate Innovation (LCI), then the

Office of Planning and Research [OPR]) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit, such as transit priority areas, those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." LCI also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

LCI Technical Advisory on Evaluating Transportation Impacts under CEQA

Pursuant to the mandate in SB 743, LCI (then OPR) adopted the revised State CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3 was added to State CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts." In accordance with this requirement, State CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." The requirements of SB 743 went into full effect as of July 1, 2020.

REGIONAL

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for six southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial) and is federally mandated to develop plans for regional transportation, land use and growth management, and air quality. Los Angeles County is one of many local and regional jurisdictions comprising SCAG. The Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) identifies the transportation priorities for the Southern California region and is based on a 20-year planning horizon. The SCS is a required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by the California Air Resources Board (CARB). It provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the South Coast Air Quality Management District (SCAQMD). The policies and goals of the RTP/SCS focus on the need to coordinate land use and transportation decisions to manage travel demand. SCAG updates its RTP/SCS every four years. SCAG's 2024–2050 RTP/SCS Connect SoCal was adopted in April 2024.

LOCAL

County of Los Angeles General Plan 2035

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) Mobility Element is one of the seven mandatory elements of the County's General Plan (County of Los Angeles, 2015). The County's Mobility Element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The County's Mobility Element assesses the challenges and constraints of the Los Angeles County transportation system and offers policy guidance to reach the County's long-term mobility goals. Two sub-elements, the Highway Plan and Bicycle Master Plan, supplement the County's Mobility Element. These plans establish policies for the roadway and bikeway system in the incorporated areas, which are coordinated with the networks in the 88 cities in Los Angeles County. The General Plan also establishes a program to prepare community pedestrian plans, with guidelines and standards to promote walkability and connectivity throughout the unincorporated areas.

County of Los Angeles Bicycle Master Plan

The County Bicycle Master Plan (BMP) provides a comprehensive planning vision for bicycle facilities in unincorporated communities of Los Angeles County. The goal of the BMP is to improve bicyclist mobility and ridership by expanding the bikeway network, connecting gap segments, addressing constrained locations, and encouraging residents to bicycle more often. The latest version of the BMP was approved by the County Board of Supervisors in 2012, and an update to the Plan is expected to be completed and approved by late 2026.

City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element (City of Los Angeles 2016). The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the latest amendment on September 7, 2016. The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

1. Safety First;
2. World Class Infrastructure;
3. Access for All Angelenos;
4. Collaboration, Communication, and Informed Choices; and
5. Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals.

Los Angeles County Transportation Impact Analysis Guidelines

In 2020, Los Angeles Public Works published its *Transportation Impact Analysis (TIA) Guidelines,* which established the most current procedures and requirements for evaluating transportation impacts associated with development and transportation projects in unincorporated Los Angeles County (Los Angeles County Public Works, 2020). The guidelines outline when a Transportation Impact Analysis is required and describe the process for analyzing project-generated travel impacts, particularly VMT, in accordance with CEQA. The document provides screening criteria, impact thresholds, and methodologies for assessing transportation impacts for both development and transportation projects, including guidance on modeling travel demand using the SCAG RTP/SCS model. The guidelines also describe mitigation strategies such as transportation demand management (TDM) programs and multimodal infrastructure improvements to reduce VMT. In addition, the document outlines procedures for site access studies, construction-phase analysis, and local residential street cut-through analysis, as well as the required format and contents of Transportation Impact Analysis reports submitted to Public Works for review.

Northeast Los Angeles Community Plan

In June 1999, the Los Angeles City Council adopted the Northeast Los Angeles Community Plan, which serves to guide planning goals, policies, and development standards for the area of Los Angeles that includes Atwater Village, Cypress Park, Eagle Rock, El Sereno, Glassell Park, Highland Park, Lincoln Heights, Montecito Heights, Monterey Hills, and Mount Washington (City of Los Angeles 1999). The community plan has five high-level planning priorities:

1. Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.
2. Improving the function, design, and economic vitality of the commercial districts.
3. Preserving and enhancing the positive characteristics of existing uses and ensuring that future developments improve the identity and appearance of neighborhoods and communities by providing guidance regarding scale, height, bulk, setbacks, design, and landscaping.
4. Regulating the development opportunities associated with the future rail transit system to maximize the economic potential while minimizing any adverse impacts.
5. Revitalizing commercial and industrial development sites with needed job-producing uses that improve the economic and physical condition of the Northeast Los Angeles Community Plan Area.

City of Los Angeles Vision Zero Action Plan

The Vision Zero Los Angeles program, implemented by City of Los Angeles Department of Transportation (LADOT), represents a Citywide effort that initially sets out to eliminate traffic deaths in the City. To achieve Vision Zero, LADOT has identified a network of streets, called the

High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2024, represents eight percent of the City's street miles but accounts for approximately six percent of all fatalities and serious injury collisions.

City of Los Angeles Municipal Code

City of Los Angeles Municipal Code (LAMC) Section 12.37, *Waivers of Dedication and Improvement*, requires certain projects to dedicate and/or implement improvements within the public right-of-way to meet the street designation standards of the latest amendment of the *Mobility Plan 2035*.

Plan for A Healthy Los Angeles

The Plan for A Healthy Los Angeles (City of Los Angeles Department of City Planning, 2021) includes policies directing several City departments to develop plans that promote active transportation and safety.

3.15.1 Existing Conditions

This section documents the existing transportation network and surrounding street system. The main campus of the Project Site is bound by Zonal Avenue to the north, Cummings Street and Chicago Street to the east, Marengo Street to the south, and Mission Road to the west. The following sections describe the existing street system and public transit, bicycle, and pedestrian facilities in and surrounding the Project Site.

EXISTING STREET SYSTEM

Major streets serving the Project Site include Marengo Street and Zonal Avenue in the east-west direction, and North State Street, Mission Road, and Soto Street in the north-south direction. Regional access is provided by the I-5 Freeway and the I-10 Freeway, with a northbound entrance ramp to the I-5 directly adjacent to the Project Site, and the nearest entrance and exit ramp to the I-10 approximately 1,000 feet from the Project Site.

The City of Los Angeles Mobility Plan 2035 classifies streets based upon their current dimensions, land use context, and function. The street designations influence their overall design including street widths and lane configuration. The following list describes the functional classification of the streets directly adjacent to the Project Site:

- Marengo Street: Avenue I
- Zonal Avenue/Cornwell Street/Charlotte Street: Avenue III
- Soto Street: Avenue I
- Mission Road: Boulevard II
- State Street: Avenue II

Described below are the primary freeways and roadways that provide regional and local access to the Project Site.

Freeways

- **Interstate 5 (I-5, Golden State Freeway)** operates in the north-south direction and is located west of the Project Site. The I-5 generally provides five lanes of travel in both directions in this area. The interchange with the I-10 Freeway is also located approximately a quarter mile southwest of the Project Site. Access to the Project Site is provided by off ramps on North Soto Street, North Mission Road, and North State Street.
- **Interstate 10 (I-10, San Bernadino Freeway)** operates in the east-west direction and is located south of the Project Site. In this area, the I-10 generally provides six lanes of travel in both directions. Access to the Project Site is provided by off ramps on Soto Street, and State Street.

Roadways Adjacent to the Proposed Project

- **Mission Road** operates in the north-south direction and is designated as Boulevard II. It is west of the Project Site and provides two lanes of travel in both directions with left turn pockets. There are also Class II bike lanes on both sides of the corridor and parking is not permitted.
- **Marengo Street** operates in the east-west direction and is designated as Avenue I. It is the southern boundary of the Project Site and provides two lanes of travel in both directions with left turn pockets. Metered street parking is permitted in designated segments along the corridor.
- **Zonal Avenue** operates in the east-west direction and is designated as Avenue II. It represents a partial segment of the northern boundary of the Project Site. It provides one lane of travel in both directions with occasional left and right turn pockets. There are also Class II bike lanes in both directions between North Mission Road and North State Street. Metered street parking is permitted in designated segments along the corridor.

Other Roadways that Provide Local and Regional Access to the Project Site

- **Valley Boulevard** operates in the east-west direction and is designated as Avenue I. It is approximately 2,000 feet north of the Project Site and provides two lanes of travel in each direction with occasional left and right turn pockets. Parking is not permitted on the segment closest to the Project Site.

Stop Control

There are eight signalized intersections bordering the Project Site: Marengo Street & North Mission Road, Marengo Street & State Street, Marengo Street & Brittania Street, Marengo Street & North Cummings Street, Marengo Street & Chicago Street, Zonal Avenue & North

Mission Road, North Mission Road & Sichel Street, and North Mission Road & Workman Street. All other intersections include either of the following control types:

- All-way stop control, where every approach must come to a complete stop.
- Side-street stop control, where only vehicles entering from side streets must come to a complete stop

The Project Site also includes an internal network of driveways and alleyways, most of which are side-street stop controlled.

EXISTING PUBLIC TRANSIT

The Project Site is served by several LA Metro and LADOT bus routes both directly adjacent to the Project Site and to the LAC and USC Medical Center Bus Station located approximately 700 feet from the Project Site on the El Monte Busway along I-10.

Bus Routes Adjacent to the Project Site

- **Metro Line 106** connects Monterey Park and Montebello via Cal State LA, Union Station, and East LA. The route serves Marengo Street adjacent to the Project Site and has 15- to 20-minute headways during weekday peak hours. The route is expected to include weekend service with 20- to 40-minute headways as part of LA Metro's NextGen bus plan (Los Angeles County Metropolitan Transportation Authority 2020).
- **Metro Line 251** connects Eagle Rock to the Long Beach Boulevard Station on the Metro C Line via Lincoln Heights, Huntington Park, and South Gate. The route serves Marengo Street adjacent to the Project Site and has 10-minute headways during weekday peak hours.
- **Metro Line 605** connects multiple destinations on the LA County Hospital campus to the Metro J line and Boyle Heights. The route serves the interior of the Project Site, as well as Zonal Avenue, Mission Road, and Marengo Street adjacent to the Project Site. The route has 15- to 20-minute headways during weekday peak hours.
- **LADOT DASH Boyle Heights/East LA** connects the LA County General Hospital to Boyle Heights and East LA. The route has 20-minute headways on weekdays.

Bus Routes Serving the LAC and USC Medical Center Bus Station

- The **Metro J Line** is a bus rapid transit line that connects El Monte to the Harbor Gateway Transit Center along the I-10 and I-110 Freeways. The line has 15- to 20-minute headways during weekday peak hours.
- The **Metro 487/489 Lines** respectively connect Sierra Madre Villa and Arcadia to Union Station via Cal State LA and the LAC and USC Medical Center Bus Station. The line has 20-minute headways during weekday peak hours.

- The **Foothill Transit Lines 490, 493, 495, 498, 499, 699, and 707** all connect Downtown Los Angeles to destinations across the San Gabriel Valley. These are commuter express services with 20- to 30-minute headways during weekday peak hours, and no service during off-peak hours.

EXISTING BICYCLE AND PEDESTRIAN FACILITIES

Bicycle Facilities

The City of Los Angeles' Mobility Plan 2035 utilizes CALTRANS Highway Design Manual designations for bicycle facilities. The designations are as follows:

- **Class I Shared-Use Path:** Provides a completely separated right-of-way from roadways for the exclusive use of cyclists and pedestrians.
- **Class II Bicycle Lane:** Provides a striped lane for one-way travel on a street, which may include a buffer zone consisting of a striped portion of roadway between the bicycle lane and the nearest vehicle travel lane.
- **Class III Bicycle Route:** Provides for shared use with motor vehicle traffic to help guide bicyclists between major destinations. Denoted via signage or limited paint.
- **Class IV On-Street Separated Bikeway:** Provides a right-of-way designated exclusively for bicycle travel, which is protected from vehicular traffic. Types of separation include, but are not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

There are Class II painted bike lanes on both sides of the roadway along Mission Road and on Zonal Avenue between Mission Road and State Street.

The City of Los Angeles's Mobility Plan 2035 includes a planned extension of the Class II bike lanes on Zonal Avenue to Soto Street. It also proposes a Class III shared bike route on State Street between Marengo Street and East 4th Street.

Pedestrian Facilities

There are sidewalks along both sides of State Street within the Project Site, with three unsignalized and one signalized marked crosswalks within the Project Site. Marengo Street and Mission Road have sidewalks, curb ramps, and streetlights on both sides of the street, in addition to marked crosswalks at signalized intersections fronting the Project Site. Zonal Avenue has sidewalks on both sides of the street, with curb ramps and marked crosswalks at stop-controlled intersections and midblock crossings. North Cummings Street and North Chicago Street have sidewalks and streetlights on both sides of the street, with a marked crosswalk at the stop-controlled intersection of North Chicago Street & Marengo Street.

3.15.3 Standards for Analysis

SIGNIFICANCE CRITERIA

The methodology and analysis in this chapter are based on LCI's Technical Advisory on Evaluating Transportation Impacts under CEQA ("LCI Guidelines"), the significance criteria in Appendix G of the State CEQA Guidelines, and the Los Angeles County Transportation Impact Analysis Guidelines ("LA County TIA Guidelines") (Los Angeles County Public Works 2020). According to Appendix G, Section XVII, of the State CEQA Guidelines poses the following transportation-related questions:

a) Would the project 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)?

c) Would the project substantially increase hazards due to a geometric design feature or incompatible use?

d) Would the project result in inadequate emergency access?

Since the certification of the 2014 Master Plan EIR, Appendix G of the State CEQA Guidelines has been updated several times, most substantively in 2018 (effective January 2019). With respect to transportation, SB 743 directed LCI (then OPR) to revise the State CEQA Guidelines to promote the reduction of VMT, decreased reliance on automobile travel, and support for multimodal transportation systems, consistent with statewide goals for GHG emissions reduction, infill development, and improved mobility. Prior to these revisions, transportation impacts were typically assessed based on vehicle delay and LOS. Appendix G's transportation section was substantially revised and retitled from "Transportation/Traffic" to "Transportation," consistent with new State CEQA Guidelines Section 15064.3, which states that automobile delay is not a significant environmental impact under CEQA. The revised checklist aligns transportation impact questions with a VMT-based analysis framework and emphasizes consistency with circulation plans and policies for all modes of travel, including transit, bicycle, and pedestrian facilities. As a result, transportation analyses prepared after adoption of these revisions evaluate impacts based on VMT and multimodal considerations rather than LOS-based congestion metrics.

METHODOLOGY

Program, Plan, Ordinance, or Policy Consistency

Project consistency is considered as non-preclusion of goals and objectives from applicable programs, plans, ordinances, and policies through development of the Proposed Project, such that environmental effects would result. If the Proposed Project is determined to conflict with such an existing goal or objective (i.e., it will impede achievement of the goal or objective), the Proposed Project could be found to result in a significant impact. Inconsistency with an applicable policy, plan, or regulation is only considered to result in a significant environmental effect under CEQA if the policy, plan, or regulation were adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical effect on the environment. A full consistency analysis is included in Appendix J, *Plans, Programs, Ordinances, Policies Review*, to this Draft SEIR.

As the Proposed Project is under the County's jurisdiction but is surrounded and served by transportation infrastructure within the jurisdiction of the City of Los Angeles, this evaluation considers consistency with both County and City relevant planning documents. The following documents are described in Section 3.15.1, *Regulatory Setting*, and their applicable goals and/or policies are described below. These documents were reviewed for consistency:

- **Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Southern California Association of Governments, 2020)** provides transportation coordination strategies between the six-county region to improve the regional transportation system's connectivity achieve greenhouse gas emission reduction goals. The top-line goals of the RTP/SCS are as follows:
  - **Communities:** Develop, connect and sustain communities that are livable and thriving.
  - **Environment:** Create a healthy region for the people of today and tomorrow.
  - **Economy:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.

Additionally, the RTP/SCS identifies Priority Development Areas (PDAs) where future growth can be located to help the region reach the stated RTP/SCS goals. People in PDAs have access to multiple modes of transportation or have trip origins and destinations closer together, allowing for shorter trips. The RTP/SCS states that development in overlapping PDAs indicates a greater alignment with RTP/SCS goals.

- **Los Angeles County General Plan: Mobility Element (Los Angeles County, 2015)** assesses challenges within the Los Angeles County transportation system and provides policies for promoting multimodal travel and increasing safety and accessibility.
  - **Goal M-1:** Street designs that incorporate the needs of all users.

- **Goal M-2:** Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.
- **Goal M-3:** Streets that incorporate innovative designs.
- **Goal M-4:** An efficient multimodal transportation system that serves the needs of all residents.
- **Goal M-5:** Land use planning and transportation management that facilitates the use of transit.
- **Goal M-6:** The safe and efficient movement of goods.
- **Goal M-7:** Transportation networks that minimize negative impacts to the environment and communities.

- **County of Los Angeles Bicycle Master Plan (Los Angeles County, 2012)** proposes a planned regional network of bicycle facilities to encourage cycling throughout the County.
  - **Goal 1:** Expanded, improved, and interconnected system of county bikeways and bikeway support facilities to provide a viable transportation alternative for all levels of bicycling abilities, particularly for trips of less than five miles.
  - **Goal 2:** Increased safety of roadways for all users.
  - **Goal 3:** Develop education programs that promote safe bicycling.
  - **Goal 4:** Encourage County residents to walk or ride a bike for transportation and recreation.
  - **Goal 5:** Community supported bicycle network.
  - **Goal 6:** Funded Bikeway Plan.
- **Mobility Plan 2035 (Los Angeles Department of City Planning, 2016)** is the mobility element of the City of Los Angeles General Plan and aims to maximize the efficiency of the transportation system in moving people and goods.
  - **Goal 1.1**: Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway users.
  - **Goal 1.2**: Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.
  - **Goal 1.4:** Design Safe Speed: Design streets to Targeted Operating Speeds as defined in the Complete Streets Design Guide
  - **Goal 2.1:** Adaptive Reuse of Streets: Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.
  - **Goal 2.2:** Complete Streets Design Guide: Establish the Complete Streets Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.

- **Goal 2.3:** Pedestrian Infrastructure: Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.
- **Goal 2.5:** Transit Network: Improve the performance and reliability of existing and future bus service.
- **Goal 2.6:** Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.
- **Goal 2.7:** Vehicle Network: Provide vehicular access to the regional freeway system.
- **Goal 2.14:** Street Design: Designate a street's functional classification based upon its current dimensions, land use context, and role.
- **Goal 3.1:** Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement - as integral components of the City's transportation system.
- **Goal 3.2:** People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.
- **Goal 3.3:** Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.
- **Goal 3.4:** Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.
- **Goal 3.5:** Multi-Modal Features: Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.
- **Goal 3.6:** Regional Transportation and Union Station: Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and high-speed rail service.

- **Northeast Los Angeles Community Plan (Los Angeles Department of City Planning, 1999)** details localized land use, transportation, and environmental goals for Northeastern Los Angeles, defined as neighborhoods east of the Los Angeles River and north of Boyle Heights.
  - **Policy 10-1.1.** Maintain Levels of Service for streets and not to exceed LOS "D" for avenues, collector streets, and local streets; not to exceed LOS "E" on Boulevards or in the community's major business districts.
  - **Policy 10-1.2.** Design new development projects to minimize disturbance to existing traffic flow with proper ingress and egress to parking.
  - **Policy 10-1.3.** Discourage non-residential traffic flow for streets designed to serve only residential areas by the use of traffic control measures.

  - **Policy 11-1.2.** Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.
- **Vision Zero Action Plan (City of Los Angeles, 2017)** provides benchmarks and strategies with the goal of eliminating traffic fatalities by 2025.
  - Marengo Street, which borders the southern portion of the Project Site, was designated as part of the High-Injury Network.
- **A Plan for Healthy Los Angeles (City of Los Angeles Department of City Planning, 2021)** includes policies directing several City departments to develop plans that promote active transportation and safety.
  - **Policy 2.2.** Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials, and universal accessibility using existing tools, practices, and programs.

VMT

Analysis of conflict with State CEQA Guidelines Section 15064.3(b) pertains to the VMT resulting from the Proposed Project. The County's TIA Guidelines (July 2020) define four screening criteria to determine if further VMT analysis is required for the Proposed Project. A project need only meet one of the screening criteria to be considered "screened out." However, the County's screening criteria are only meant to serve as guidance for projects to determine whether a TIA should be performed, and criteria shall be determined on a project-by-project basis as approved by the County Department of Public Works (County of Los Angeles 2020). The County's VMT screening criteria are detailed below.

LA County VMT Screening Criteria

Non-Retail Project Trip Generation

If the answer is "no" to the question below, further analysis is not required, and a less-than-significant determination can be made:

- Does the development project generate a net increase of 110 or more daily vehicle trips?

Retail Project Site Plan

If the answer is "no" to the question below, a less-than-significant determination can be made for the portion of the project that contains retail uses:

- Does the project contain retail uses that exceed 50,000 square feet of gross floor area?

Proximity to Transit

If a project is located near a major transit stop or high-quality transit corridor, the following question should be considered:

- Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor?

If the answer to the above question is "yes," then the following subsequent questions should be considered:

- Does the project have a Floor Area Ratio (FAR) less than 0.75?
- Does the project provide more parking than required by the County Code?
- Is the project inconsistent with the SCAG RTP/SCS?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

Residential Land Use Based Screening Criteria

Independent of the screening criteria for non-retail and retail projects, certain projects that further the State's affordable housing goals are presumed to have a less-than-significant impact on VMT. If the project requires a discretionary action and the answer is "yes" to the question below, further analysis is not required, and a less-than-significant determination can be made:

- Are 100% of the units, excluding manager's units, set aside for lower income households?

Geometric Hazards

Site Access

The effects of the Proposed Project were assessed for potential increase of hazards due to a geometric design feature. These generally relates to the design of access points to, from, and within the Project Site. Such features include the general layout of intersections and the presence of pedestrian walkways. These features can affect the overall safety of the transportation network. The evaluation also includes an assessment of incompatible uses and safety impacts as a result of modal conflicts (e.g., vehicle/pedestrian).

Off-Ramp Queuing

The LADOT Transportation Assessment Guidelines (TAG) and Caltrans' Local Development Review (LDR) Safety Review Practitioner's Guidance (LDR Guidance) (Caltrans Division of Safety Programs, 2024) describe the potential safety impacts of a freeway ramp queue that extends to the mainline. In summary, the LDR Guidance notes that traffic safety mitigation may be required

if project-generated traffic volumes will cause a queue to extend onto the freeway mainline, creating a speed differential of 30 mph or greater. The LADOT TAG describes specific criteria related to studying "Future with Project" volumes for the queuing analysis, as well as the including of 50 percent of auxiliary lane lengths in ramp storage calculations (LADOT 2022). This analysis uses the "Future with Project" volumes to more conservatively identify cumulative queue lengths and does not include auxiliary lanes in ramp lengths to more conservatively evaluate the storage capacity.

The following freeway off-ramps providing access to the Project Site are analyzed for queuing:

- I-5 Southbound Off-Ramp to Mission Road
- I-10 Eastbound Off-Ramp to State Street
- I-10 Westbound Off-Ramp to State Street
- I-5 Northbound Off-Ramp to Cesar Chavez Avenue
- I-10 Eastbound Off-Ramp to Soto Street
- I-10 Westbound Off-Ramp to Soto Street

Inadequate Emergency Access

Adequacy of emergency access was evaluated using available data including the location of existing emergency support facilities, including fire stations, police stations, and hospitals. The impact analysis for Proposed Project construction would consider temporary street or lane closures and the ability of emergency responders to navigate through or around these closures. The impact analysis for Proposed Project operation would consider where the Proposed Project would create impediments to emergency response that result in delay or rerouting of response vehicles. If the Proposed Project is determined to result in inadequate emergency access, a significant transportation impact will be found.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future project and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparing with the analysis included in section 3.15.3, *Project Impact Analysis*,, and 3.15.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the Master Plan would result in significant impacts related to traffic, utilizing the former LOS-based approach to determining traffic impacts under CEQA, particularly for intersection delay at a collection of study intersections under future scenarios and for active transportation facilities during project construction. The EIR identified Mitigation Measures TRAF-1 through 3, which required preparation of traffic control plans during construction, several intersection improvements, and implementation of TDM strategies.

The EIR concluded that significant and unavoidable impacts to intersection delay would remain at select intersections even after mitigation measures were applied. Table 3.15-1, *Summary of the 2014 Master Plan EIR Transportation Impact Conclusions*, provides an overview of previous traffic impact analysis findings.

Table 3.15-1 Summary of the 2014 Master Plan EIR Transportation Impact Conclusions

Significance Criteria [1]	Significance without Mitigation	Mitigation Measure [2]	Significance with Mitigation
TRAF-1: Conflict with plan, ordinance, or policy established measures of effectiveness for the performance of the circulation system?	Potentially Significant (construction) Significant (operation)	MM-TRAF-1 MM-TRAF-2 MM-TRAF-3	Less than Significant (construction) Significant and Unavoidable (operation)
TRAF-2: Conflict with applicable congestion management program, include LOS and Travel Demand Measures, or other standards established by the County Congestion Management Agency?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
TRAF-3: Result in a change in air traffic patterns, include an increase in traffic level or change in location resulting in substantial safety risk?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
TRAF-4: Substantially increase hazards due to a design feature or incompatible uses?	Potentially Significant (construction) No Impact (operations)	MM-TRAF-1	Less Than Significant (construction) No Impact (operation)
TRAF-5: Result in inadequate emergency access?	Potentially Significant (construction) No Impact (operations)	MM-TRAF-1	Less Than Significant (construction) No Impact (operation)
TRAF-6: Conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities or decrease performance or safety of such facilities?	Significant (construction) Less Than Significant (operation)	MM-TRAF-1	Less Than Significant (construction and operation)
TRAF-7: Result in inadequate parking capacity?	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)

Source: County of Los Angeles 2014.

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this SEIR uses current significance criteria, which differs from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Mea*sures*, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.15.4 Project Impact Analysis

This section evaluates the Proposed Project's potential impacts on ground transportation resulting from Project construction and operation.

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

Construction

Phased construction activities resulting from implementation of the Proposed Project could involve intermittent closures of the public rights of way surrounding the Project Site, including vehicle roadways, bicycle, and pedestrian facilities. These closures could temporarily conflict with plans and policies related to accessing transit service and active transportation facilities, as well as ordinances and regulation regarding lane widths, sight distance, or truck routes. Impacts would be temporary but could be potentially **significant**.

Impact TRA-1: Construction of the Proposed Project could create potentially significant impacts to programs, plans, ordinances, or policies addressing the circulation system.

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

- Provide a roadway layout that shows the locations of construction activity and surrounding roadways to be used as detour routes, including special signage.
- Establish detour routes in coordination with the City of Los Angeles to minimize disturbances to local roadway conditions.
- Maintain access to existing residences at all times.

- Work with City of Los Angeles Department of Transportation, Los Angeles Sherriff's Department, Los Angeles County Fire Department, and Los Angeles Police Department, to coordinate all construction-related plans and minimize disturbances to local emergency management services (EMS) providers ensure that alternative evacuation and emergency routes are designed to maintain response times during construction.
- Provide adequate off-street parking areas at designated staging areas for construction-related vehicles.
- Work with transit provides to maintain access and circulation routes to existing stops during construction phases and identify appropriate detours to provide rerouting during construction while minimizing service disruptions.
- Work with the City of Los Angeles to maintain continuity and operations of existing pedestrian and bicycle facilities during construction.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure TRA-1 would reduce impacts to less than significant levels. The Worksite Traffic Control Plan will account for the phased development of the Proposed Project as appropriate. This includes any necessary adjustments in accordance with the location of current and planned construction activity. Impacts would be **less than significant**.

Operation

A detailed analysis of applicable programs, plans, ordinances, and policies as they relate to the Proposed Project are included in Appendix J, *Plans, Programs, Ordinances, Policies Review*. The Proposed Project prioritizes active transportation throughout the Project Site with proposed bicycle and pedestrian-oriented and pedestrian-only pathways and trails, and by aligning new entrances and pedestrian paths with existing pedestrian routes and crosswalks. Furthermore, the Proposed Project would add public bicycle parking stations along the existing bikeway on Mission Road, which connects into the networks along the Los Angeles River and towards Downtown Los Angeles. In addition, the Proposed Project would include potential development of a Mobility Hub, which, once built, would serve local buses, a campus shuttle, and provide a bicycle parking station.

Overall, the Proposed Project would not preclude the implementation of applicable policies and, in many cases, would support the goals of applicable programs, plans, and policies. Such consistency and support are described in Appendix J, *Plans, Programs, Ordinances, Policies Review*. Thus, operations of the Proposed Project would have a **less-than-significant** impact.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

Construction

Per State CEQA Guidelines Section 15064.3(b)(3), construction-related VMT may be analyzed qualitatively, based on factors including availability of transit and proximity to other destinations. As such, only VMT impacts related to Proposed Project operations are analyzed quantitatively.

Construction associated with the Proposed Project would generate temporary trips that are not characteristic of the Proposed Project itself. The Proposed Project is located in an urbanized area nearby transit and alternative routes, which could minimize VMT associated with the construction workforce (e.g. Metro J Line, Metrolink, as well as Metro Bus Lines 106, 251, 605, and LADOT DASH Boyle Heights/East LA).

Furthermore, the Proposed Project exists in a centralized location relative to the regional workforce, and in proximity to multimodal transportation facilities. Thus, home-based work VMT associated with the construction workforce of the Proposed Project would be relatively low compared to many other areas in the region.

VMT associated with Proposed Project construction would be **less than significant**, and no mitigation measures are required.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operations

The Proposed Project would result in a significant impact if it conflicted with State CEQA Guidelines Section 15064.3(b) due to the VMT of the Proposed Project. The methodology for analysis of a potential VMT impact depends on Proposed Project land use, location, and size. As described in Section 3.15.3, *Standards of Analysis*, the County's TIA Guidelines define four screening criteria to determine if further VMT analysis is required for the Proposed Project. The following text evaluates the Proposed Project against the County's screening criteria.

VMT Screening Assessment

Non-Retail Project Trip Generation

Based on the land use mix and size, the Proposed Project's trip generation is estimated to be greater than 110 daily trips and is, therefore, **not screened out** based on this criterion.

Retail Project Site Plan

The retail portion of the Proposed Project is proposed to be 320,000 square feet, which would exceed 50,000 square feet of gross floor area and is, therefore, **not screened out** based on this criterion.

Residential Land Use

The residential component of the Proposed Project would consist of mixed-income housing and, therefore, would **not qualify for screening** from further VMT analysis under this criterion

Proximity to Transit

Per Los Angeles County Transportation Impact Analysis guidelines, if a project is located near a major transit stop or high-quality transit corridor, the following question should be considered:

- Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor?
  - "Major transit stop" is defined in the 2024 SCG RTP/SCS as a site containing and existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
  - "High Quality Transit Corridor" is defined as an existing fixed bus route with service intervals no longer than 15 minutes during peak commute times (SCAG RTP/SCS, 2024).

If the answer to the question above is yes, then the following subsequent questions should be considered:

- Does the project have a Floor Area Ratio less than 0.75?
- Does the project provide more parking than required by the County Code?
- Is the project inconsistent with the SCAG RTP/SCS2?
- Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

If the answer to all four questions is no, further analysis is not required, and a less than significant determination can be made (Los Angeles Public Works, 2020). The answers to the previous questions are explained below.

The Project Site is located within a one-half mile radius of the LA General Medical Center station on the LA Metro J Line (910/950). The Metro J Line qualifies as a high-quality transit corridor, as it provides service intervals of no longer than 15 minutes during peak commute hours (Los Angeles County Metropolitan Transportation Authority 2025).

The Proposed Project proposes a maximum FAR of 2.2 (8,060,978 Proposed Project square feet, 81.9 acre site area), which is higher than the 0.75 screening criteria. In addition, the Proposed Project provides less parking than required by County Code. Furthermore, the Project Site is located within two types of Priority Development Areas (PDAs) as defined in the 2024 SCAG RTP/SCS:

- Transit Priority Areas: An area located within one-half mile of an existing or planned major transit stop.
- Livable Corridors: Corridors which provide housing, employment opportunities, goods and services, and access to a High Quality Transit Corridor.

PDAs are defined in the 2024 SCAG RTP/SCS as areas within the SCAG region where future growth should be prioritized to help the region reach RTP/SCS goals. This location within two PDAs suggests that the Proposed Project is not inconsistent with the 2024 SCAG RTP/SCS. Lastly, because there are no housing units currently on the Project Site, the Proposed Project would not replace any residential units set aside for lower-income households.

Based on the Project Site's location within a one-half mile radius of a high-quality transit corridor and the information regarding the County's FAR, parking, consistency with SCAG RTP/SCS, and residential unit replacement considerations, the Proposed Project would be **screened out** based on this criterion and would be presumed to have a **less-than-significant** VMT impact.

Summary

VMT associated with Proposed Project construction would be **less than significant**, and no mitigation measures are required. As explained in Section 3.15.3, *Standards of Analysis*, the Proposed Project only needs to meet one of the four screening criteria to be screened out of the VMT analysis. Operational activities for the Proposed Project are presumed to have a **less-than-significant** VMT impact based on the Proximity to Transit screening criterion.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Quantitative VMT Data

While unnecessary for impact determination purposes given the screening criteria assessment described in the *VMT Screening Assessment* discussion, this section presents the VMT data for the Proposed Project.

Existing Countywide VMT metrics are summarized in Table 3.15-2*, Existing Countywide VMT*.

Table 3.15-2 Existing Countywide VMT

Metric	Work	Residential
Total Los Angeles County VMT [1]	72,960,600	168,715,100
Number of Employees/Residents [2]	5,111,626	10,188,492
VMT per Employee/Capita [3]	14.3	16.6

Source: Fehr & Peers, 2025.

1. Total VMT values are rounded to the nearest hundred.
2. Number of Employees is used for Work VMT, and number of Residents is used for Residential VMT.
3. VMT per Employee is used for Work VMT, and VMT per Capita is used for Residential VMT.

Table 3.15-3, *Proposed Project VMT (2050),* represents development of all land uses included in the Proposed Project. The table shows daily residential and work VMT per capita, as well as the number of residents and employees associated with the Proposed Project land uses.

Table 3.15-3 Proposed Project VMT (2050)

Metric	Work	Residential
VMT [1]	75,800	73,100
VMT per Employee/Capita[2]	10.6[3]	7.6[3]

Source: Fehr & Peers, 2025.

1. Total VMT values are rounded to the nearest hundred.
2. VMT per Employee is used for Work VMT, and VMT per Capita is used for Residential VMT.
3. Number of Employees is used for Work VMT, and number of Residents is used for Residential VMT. The number of employees and residents used in the VMT per-capita calculations are 7,141 and 9,634, respectively. While the Proposed Project's estimated employment and population values (7,482 and 8,000, respectively, as shown in Table 3.12-7, *Potential Project Employment and Population Projections*, of this Draft SEIR) are based on general conversion assumptions for land use quantities, the metrics within the VMT calculations are developed as is typical for travel demand forecasting, described below.

- Population values in activity-based models do not rely on input values or general conversion factors. Population values are instead developed using the number of households (3,200 units, consistent with the Proposed Project description), with household and person profiles copied from the model's pre-established synthetic population dataset. Random households from a separate transportation analysis zone (TAZ) adjacent to the Project Site in the Lincoln Heights neighborhood were selected, matching the number of dwelling units for the Proposed Project, and copied to the Proposed Project TAZ.
  - This process allows for matching the target number of households but not necessarily the exact same population estimated in the Proposed Project Description. The Proposed Project population estimate provided here is solely for VMT per capita forecasting purposes and does not supersede any Proposed Project population provided elsewhere.
  - While the Proposed Project proposes a different housing typology than what currently exists in the Lincoln Heights neighborhood (larger apartment buildings as opposed to primarily single-family houses with accessory dwelling units, quadraplexes, small multifamily buildings, etc.) it is assumed for this analysis that the residential component of the Proposed Project would largely serve housing demand in the existing community (Lincoln Park and Boyle Heights), rather than just serving a new demographic in the

neighborhood (i.e. a demographic reflective of Downtown Los Angeles.), despite the different layout and appearance of the buildings themselves.

- Employment values were estimated using floor area-to-employee factors in the Los Angeles Department of Transportation Vehicle Miles Traveled Calculator Documentation Version 1.3 (2020), which is a typical source document for travel demand forecasting calculations. The Proposed Project employee estimate provided here is solely for VMT forecasting purposes and does not supersede any Project population provided elsewhere.

Table 3.15-4, *Proposed Project VMT Measured Against Existing Countywide VMT*, compares Proposed Project VMT to the existing countywide VMT threshold and shows the following:

- **Daily residential VMT** per capita is estimated to be 7.6, which is 54 percent below the Existing Countywide residential VMT per capita of 16.6.
- **Daily work VMT** per employee is estimated to be 10.6, which is 26 percent below the Existing Countywide work VMT per employee of 14.3.

Table 3.15-4 Proposed Project VMT Measured Against Existing Countywide VMT

Metric	Existing Countywide	Proposed Project VMT	Percent Reduction
Residential per Capita	16.6	7.6	54%
Work per Employee	14.3	10.6	26%

Source: Fehr & Peers, 2025.

To quantify the effect of the Proposed Project's retail portion on regional VMT, a 15-mile radius around the Project Site was used to compare the Proposed Project (including retail) to a Proposed Project scenario without any retail uses. The 15-mile radius encompasses much of southern Los Angeles County, bounded generally by Santa Monica to the west, Compton to the south, West Covina to the east, and Sunland-Tujunga to the north. This area was chosen as a reasonable catchment area for the proposed retail uses, which while not yet specifically known, are generally intended to be local and community serving.

The total roadway VMT within a 15-mile radius of the Proposed Project is estimated to be 42,600 miles lower than a Proposed Project scenario without retail uses. Without the retail uses, the link VMT within the 15-mile radius would be approximately 108,200,400, and with the retail would be approximately 108,157,800. Thus, the "with retail" scenario would reduce VMT by 42,600 miles as compared to "without retail." The "with" versus "without" retail roadway VMT calculations compare both scenarios to a 2050 No Project baseline. The "without retail" reduction is largely attributable to the Project's concentration of housing and jobs in the dense, mixed-use core of the County of Los Angeles. The inclusion of retail further results in a lower regional VMT due to various reasons, including the following:

- **Internal capture:** trips that would have been added on the street network stay on site, e.g. walking to retail from another use on site instead of driving.

- **Trip chaining:** a portion of retail trips may be combined with other trips rather than becoming separate trips.
- **Pass-by trips:** a portion of retail trips come from drivers who were already making a trip anyway, which adds less new VMT.
- **Trip length reduction:** densification of regional retail uses can reduce trip lengths by replacing longer-distance trips with shorter local trips.

Thus, the inclusion of retail would reduce the overall Proposed Project's effect on regional VMT.

This quantitative data indicates that:

- Residential and per employee VMT generated by the Proposed Project is less than the County's threshold.
- The retail component of the Proposed Project would reduce regional VMT compared to a Proposed Project scenario without retail.
- Confirms that the analysis approach concluding a less-than-significant impact due to meeting the County's VMT screening criteria is appropriate.

Therefore, the Proposed Project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3 subdivision (b) regarding VMT, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

c) Would the project substantially increase hazards due to a geometric design feature or incompatible use?

Construction

Proposed Project construction would involve the staging of heavy equipment, hauling of excavated materials from the construction site, and additional deliveries of construction materials during the requisite phases of development. Construction would also involve the daily staging and transportation of the workforce required to develop the Proposed Project, which may involve shift work. Construction activities may require roadway restrictions, lane closures, and similar actions which could create non-standard road geometry and lane configurations. Additionally, the operation of heavy equipment and construction activity associated with the Proposed Project could be incompatible with surrounding land uses and roadway function. These impacts would be temporary but could be potentially **significant**.

Impact TRA-2: The Proposed Project's construction activities have the potential to result in transportation hazards.

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. Because the Proposed Project would implement a Worksite Traffic Control Plan as part of MM TRA-1, follow applicable Caltrans and FHWA design standards, secure required permitting for any oversized truck trips, and coordinate with Los Angeles Unified School District regarding pedestrian access to schools, construction activity would not increase hazards due to geometric design features or incompatible uses and impacts would be **less than significant**.

Operations

The final Proposed Project design would comply with applicable engineering standards as to not introduce geometric hazards, including both the County and City's Design Guidelines (depending on geographic location), MUTCD, and ADA requirements.

Vehicle access to the Proposed Project may include up to seven entrances. Two entrances could be via State Street, which is an existing north-south roadway that crosses through the center of the Project Site between Marengo Street and Zonal Avenue; rideshare drop-off zones could be located in this area. One vehicular entrance from Marengo Street would provide access to multiple proposed parking facilities. Two entrances may be established from Mission Road, leading to multiple parking entrances. Two additional entrances on Zonal Avenue would access parking. All roadway entrances to the Project Site would be designed to relevant roadway standards as to not introduce hazardous geometric conditions.

Existing Class II bicycle facilities along Mission Road and Zonal Avenue would provide bicycle access to the Project Site. Designated bicycle parking would be provided on Marengo Street, at the State Street entrance, and at the primary North Mission Road entrance. Pedestrian access would be provided via sidewalks along Zonal Avenue, Mission Road, and Marengo Street. Zonal Avenue and Marengo Street connect to State Street, which would link all major transportation facilities within the Project Site and would provide sidewalks and marked crosswalks. The Proposed Project includes the potential addition of a Mobility Hub, to strategically located to enhance access to existing surrounding bus lines and the existing internal campus shuttle. These areas would accommodate local bus routes and campus shuttles, enhancing transit connectivity to the Project Site. Pedestrian, bicycle, and transit access to the Project Site would be designed to relevant standards as to not introduce hazardous geometric conditions.

Off-Ramp Queueing

Traffic Volume Development

Queuing was analyzed for future (2050) conditions with and without Proposed Project trips ("2050 Base" and "2050 with Project"). The 2050 Base volumes are based on October 2025 traffic counts grown at 0.5 percent annually through 2050, a rate derived from the City of Los

Angeles 2025 Travel Demand Model. For the 2050 with Project conditions, Proposed Project trips were estimated using the Institute of Transportation Engineers (ITE) 12th Edition methodology for the land use types and quantities in the Proposed Project Description. Proposed Project trips were then distributed and assigned to the roadway network using the 2024 SCAG RTP/SCS Activity-Based Model (ABM) for regional distribution, as well as local travel patterns, and Proposed Project driveway locations. The Proposed Project volumes were then added to the 2050 Base volume.

Queuing Analysis Methodology

The 95th percentile queue lengths for the AM and PM peak hours were calculated for the 2050 Base and 2050 with Project conditions using Synchro 12, which applies either the Highway Capacity Manual (HCM) 7th Edition or percentile delay methods based on lane configuration and signal phasing. Existing signal timing and phasing were based on LADOT timing sheets.

While static intersection analysis is useful for estimating the relative effect of Proposed Project trips and operational improvements, actual queue lengths are better estimated using microsimulation tools such as SimTraffic. Static, isolated intersection operations analyses (e.g., Synchro) have inherent limitations, listed below, especially under heavily congested conditions:

- Limited representation of upstream/downstream interaction (e.g., spillback, demand starvation)
- Limited evaluation of turn-lane blocking and its effects on throughput
- Mathematically derived calculations may underestimate queues for oversaturated conditions

Speed Differential Methodology

As described in section 3.15.3, where Proposed Project-generated traffic may cause off-ramp queues to extend onto the freeway mainline, the speed differential between mainline traffic and the queued off-ramp traffic was evaluated. Per Caltrans' LDR Guidance, a speed differential of 30 miles per hour (mph) or greater may pose safety concerns. Speed data were obtained from StreetLight, which uses connected vehicle location data. Due to limitations in available data periods, speeds from Wednesday, December 3, and Thursday, December 4 2025 were analyzed as representative weekday conditions. For each study off-ramp, mainline or connector speeds immediately upstream of the gore point were summarized for the AM and PM peak periods. Off-ramp queues were assumed to operate at zero speed; therefore, the mainline or connector speed represents the speed differential.

Queuing Analysis Results

The off-ramp queuing analysis results are presented in Table 3.15-5 through Table 3.15-8. Table and Table 3.15-5 and Table 3.15-6 summarize the AM peak hour results, while Table 3.15-7 and Table 3.15-8 summarize the PM peak hour results. Table 3.15-5 and Table 3.15-7 show estimated queue lengths for the 2050 Base and 2050 with Project conditions (for AM and PM, respectively), compared to off-ramp storage capacity, and identify increases in queue length and any storage exceedances. For ramps where the 2050 with Project queues exceed storage by more than two vehicle lengths, the corresponding mainline speeds are reported. The final column indicates whether a speed differential–related safety concern is expected. Table 3.15-6 and Table 3.15-8 show the effects of operational improvements which are discussed in the next section.

As shown in the Tables 3.15-5 through 3.15-8, potential safety issues are expected for at least four locations. The four affected locations are listed below, with the affected peak hour(s) noted:

- I-5 southbound off-ramp to Mission Road (AM peak hour only)
- I-10 westbound off-ramp to State Street (AM and PM peak hours)
- I-5 northbound off-ramp to Cesar Chavez Avenue (AM peak hour only)
- I-10 westbound off-ramp to Soto Street (AM and PM peak hours)

In each of these locations, the 2050 with Project queue lengths would exceed the available storage, the Proposed Project would add more than two vehicles' length of queuing, and the speed differential would be greater than 30 mph. This results in an unacceptable queue length at these four locations

As described in the queuing analysis methodology, microsimulation would be required to fully capture queues where demand exceeds capacity. Accordingly, "acceptable" queue lengths from static analyses should be interpreted cautiously, as downstream spillback and lane blocking may cause actual queues to exceed storage even when calculated 95th percentile queues do not.

Operational Improvements

For the four affected locations where potential safety issues were identified, operational improvements were evaluated to reduce queueing. Evaluation was limited to improvements feasible within the existing right-of-way; more extensive measures, such as added lanes or turn pockets, were assumed infeasible due to right-of-way constraints and the potential negative effect on multimodal experience. The evaluated improvements and their results are summarized in Table 3.15-6 and Table 3.15-8.

Table 3.15-5 AM Peak Hour Queues – "2050 Base" versus "2050 with Project" Comparison

	2050 Queue (ft)				2050 Base & 2050 with project Comparison			
Off-Ramp	Storage Length[1]	Base	With Project	Queue Increase (ft)	Queue Increase (veh)[2]	2050 w/ Project Exceeds Storage?	Mainline Speed (mph)[3]	Potential Safety Issue?
I-5 SB Off to Mission Rd.	1,360	1,005	1,945†	940	25+	Yes	41-47	Yes
I-10 EB Off to State St.	1,565	400	1,225†	825	25+	No	-[4]	No[5]
I-10 WB Off to State St.	880	450	3,425†	2,975	25+	Yes	40-47	Yes
I-5 NB Off to C. Chavez. Ave.	950	600	1,100†	500	20	Yes	16-50	Yes
I-10 EB Off to Soto St.	2,170	795	975†	180	8	No	-	No[5]
I-10 WB Off to Soto St.	2,320	2,815†	3,115†	300	12	Yes	42-55	Yes

Source: Fehr & Peers, 2026. Notes:

1 Storage Length is the sum of all lane-feet from the terminal intersection stop bar to the gore point.

2 Queues longer than 25 vehicles are shown as "25+". At excessive queue lengths, drivers would likely take alternative routes or alter travel behavior.

3 Range of 15-minute interval average speeds throughout peak hour on the directly upstream freeway segment (mainline or connector).

4 No queueing issue identified in 2050 with Project; thus speed differential study is not necessary.

5 "No" conclusion is based on comparison of comparison of statically calculated 95th percentile queue length to ramp storage. At volume to capacity (V/C) ratios over 1.0, queues lengths are theoretically undefined and could exceed listed length. Microsimulation analysis would be required to more accurately capture queue lengths and identify ramp spillback.

† Volume to capacity (V/C) ratio exceeds 1.0, queue lengths are technically undefined. Calculated values are shown for relative comparison purposes.

Table 3.15-6 AM Peak Hour Queues – "2050 Base" versus "2050 with Project & Operational Improvements" Comparison

	2050 Queue (ft)				2050 Base & 2050 with project Comparison			
Off-Ramp	Storage Length[1]	Base	With Project & Operational Improvements	Queue Increase (ft) Δ	Queue Increase (veh)[2]	2050 w/ Project Exceeds Storage?	Mainline Speed (mph)[3]	Potential Safety Issue?
I-5 SB Off to Mission Rd.	1,360	1,005	1,715†	710	25+	Yes	41-47	Yes
I-10 EB Off to State St.	1,565	400	-	-	-	-	-[4]	-
I-10 WB Off to State St.	880	450	1,450†	1,000	25+	Yes	40-47	Yes
I-5 NB Off to C. Chavez. Ave.	950	600	950	350	14	Yes	16-50	Yes
I-10 EB Off to Soto St.	2,170	795	-	-	-	-	-	-
I-10 WB Off to Soto St.	2,320	2,815†	2,575†	-240	-10	Yes	42-55	No[5]

Source: Fehr & Peers, 2026. Notes:

1 Storage Length is the sum of all lane-feet from the terminal intersection stop bar to the gore point.

2 Queues longer than 25 vehicles are shown as "25+". At excessive queue lengths, drivers would likely take alternative routes or alter travel behavior.

3 Range of 15-minute interval average speeds throughout peak hour on the directly upstream freeway segment (mainline or connector).

4 No queueing issue identified in 2050 with Project; thus speed differential study is not necessary.

5 "No" conclusion is based on comparison of comparison of statically calculated 95th percentile queue length to ramp storage. At volume to capacity (V/C) ratios over 1.0, queues lengths are theoretically undefined and could exceed listed length. Microsimulation analysis would be required to more accurately capture queue lengths and identify ramp spillback.

† Volume to capacity (V/C) ratio exceeds 1.0, queue lengths are technically undefined. Calculated values are shown for relative comparison purposes.

Δ Compared to 2050 Base scenario

Table 3.15-7 PM Peak Hour Queues – "2050 Base" versus "2050 with Project" Comparison

	2050 Queue (ft)				2050 Base & 2050 with project Comparison			
Off-Ramp	Storage Length[1]	Base	With Project	Queue Increase (ft)	Queue Increase (veh)[2]	2050 w/ Project Exceeds Storage?	Mainline Speed (mph)[3]	Potential Safety Issue?
I-5 SB Off to Mission Rd.	1,360	375	825	450	18	No	-[4]	No
I-10 EB Off to State St.	1,565	575	1,275†	700	25+	No	-	No[5]
I-10 WB Off to State St.	880	225	1,550†	1,325	25+	Yes	52-56	Yes
I-5 NB Off to C. Chavez. Ave.	950	200	550	350	14	No	-	No
I-10 EB Off to Soto St.	2,170	925†	1,095†	170	7	No	-	No[5]
I-10 WB Off to Soto St.	2,320	2,415†	2,730†	315	13	Yes	41-44	Yes

Source: Fehr & Peers, 2026. Notes:

1 Storage Length is the sum of all lane-feet from the terminal intersection stop bar to the gore point.

2 Queues longer than 25 vehicles are shown as "25+". At excessive queue lengths, drivers would likely take alternative routes or alter travel behavior.

3 Range of 15-minute interval average speeds throughout peak hour on the directly upstream freeway segment (mainline or connector).

4 No queueing issue identified in 2050 with Project; thus speed differential study is not necessary.

5 "No" conclusion is based on comparison of comparison of statically calculated 95th percentile queue length to ramp storage. At volume to capacity (V/C) ratios over 1.0, queues lengths are theoretically undefined and could exceed listed length. Microsimulation analysis would be required to more accurately capture queue lengths and identify ramp spillback.

† Volume to capacity (V/C) ratio exceeds 1.0, queue lengths are technically undefined. Calculated values are shown for relative comparison purposes.

Table 3.15-8 PM Peak Hour Queues – "2050 Base" versus "2050 with Project & Operational Improvements"

Off-Ramp	2050 Queue (ft)				2050 Base & 2050 with project Comparison			
	Storage Length[1]	Base	With Project & Operational Improvements	Queue Increase (ft)	Queue Increase (veh)[2]	2050 w/ Project Exceeds Storage?	Mainline Speed (mph)[3]	Potential Safety Issue?
I-5 SB Off to Mission Rd.	1,360	375	855	480	20	No	-[4]	No
I-10 EB Off to State St.	1,565	575	-	-	-	-	-	-
I-10 WB Off to State St.	880	225	575†	350	14	No	52-56	No[5]
I-5 NB Off to C. Chavez. Ave.	950	200	-	-	-	-	-	-
I-10 EB Off to Soto St.	2,170	925†	-	-	-	-	-	-
I-10 WB Off to Soto St.	2,320	2,415†	1,985†	-430	-18	No	41-44	No[5]

Source: Fehr & Peers, 2026. Notes:

1 Storage Length is the sum of all lane-feet from the terminal intersection stop bar to the gore point.

2 Queues longer than 25 vehicles are shown as "25+". At excessive queue lengths, drivers would likely take alternative routes or alter travel behavior.

3 Range of 15-minute interval average speeds throughout peak hour on the directly upstream freeway segment (mainline or connector).

4 No queueing issue identified in 2050 with Project, thus speed differential study is not necessary.

5 "No" conclusion is based on comparison of comparison of statically calculated 95th percentile queue length to ramp storage. At volume to capacity (V/C) ratios over 1.0, queues lengths are theoretically undefined and could exceed listed length. Microsimulation analysis would be required to more accurately capture queue lengths and identify ramp spillback.

† Volume to capacity (V/C) ratio exceeds 1.0, queue lengths are technically undefined. Calculated values are shown for relative comparison purposes.

Δ Compared to 2050 Base scenario

Impact TRA-3: Operation of the Proposed Project could create potentially significant impacts to geometric hazards due to queuing at four affected off-ramp locations.

Prior to the start of construction for the first development phase of the Proposed Project, the Project Applicant(s) shall consult with County to develop timing mechanisms as to when the improvements identified in Mitigation Measure TRA-3(a)-(e) are implemented based on phased buildout of the Proposed Project.

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

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, shared through-left lane, and a right lane; to
  - two left turn lanes and one shared through-right turn lane.
- Optimize signal timing along the Mission Road coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' Intersection Safety Operational Assessment (ISOAP) methodology as appropriate to design and implement intersection improvements.

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

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, right turn lane; to
  - shared left-right turn lane and a right turn lane.
- Optimize signal timing along the State Street coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements.

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

- Re-stripe the off-ramp lane configuration from:
  - Left turn lane, shared through-left turn lane, and two right turn lanes; to
  - two left turn lanes, one through lane, and one right turn lane.
- Optimize signal timing along the Soto Street coordinated corridor, including cycle length, offset, and phase splits.
- Apply the Caltrans' ISOAP methodology as appropriate to design and implement intersection improvements

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

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

Mitigation Measure TRA-3e: A comprehensive TDM program shall be implemented as part of the Proposed Project's mitigation program aimed at reducing vehicular trips to the Project Site, which may mitigate Project-induced freeway off-ramp queuing hazards. TDM strategies that the Proposed Project could implement to result in a quantitative reduction in vehicular trips include, but are not limited to, to the following:

- Trip Reduction Strategies
  - Implement Commute Trip Reduction Program (Voluntary for Mandatory)
  - Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)
  - Implement Commute Trip Reduction Marketing
  - Provide Ridesharing Program
  - Implement Subsidized or Discounted Transit Program - All Trips
  - Provide End-of-Trip Bicycle Facilities

  - Provide Employer-Sponsored Vanpool
- Parking Strategies
  - Price workplace parking
  - Implement Employee Parking Cash-Out
  - Limit Residential Parking Supply
  - Unbundle Residential Parking Costs from Property Cost
- School
  - Coordinate with Los Angeles Unified School District (LAUSD) to establish a School Bus Program
  - Active Modes of Transportation for Youth

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

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

Transportation Demand Management

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

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

As Mitigation Measures TRA-3a through TRA-3d would not reduce Impact TRA-3 to less-than-significant levels, an additional TDM mitigation measure is described below. TDM programs can result in vehicle trip/VMT reductions due to certain types of Project Site modifications, programming, and operational changes. In turn, reductions in Proposed Project-generated vehicle trips would reduce the number of vehicles exiting the freeway to access the Project Site, reducing the effect on geometric hazards related to off-ramp queueing.

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

The TDM programs described in MM TRA-3e are typically be implemented at a project level. Given the uncertainty associated with Proposed Project phasing and site-specific land uses, the VMT and trip-reduction benefits of MM TRA-3e cannot be quantified with a reasonable degree of certainty.

d) Would the project result in inadequate emergency access?

Construction

As discussed under impact discussion (a), construction could require temporary road or lane closures that would close or restrict vehicle ingress and egress to the Project Site or access to Project Site frontage. Such restrictions could alter existing emergency response times or conflict with emergency response expectations. This may cause potentially **significant** impacts to emergency access to the Project Site.

Impact TRA-4: Proposed Project construction activities could result in potentially significant impacts to emergency access.

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. Because the Proposed Project would implement a Worksite Traffic Control Plan as part of Mitigation Measure TRA-1, which would include stipulations specific to ensuring emergency vehicle access is maintained, construction activity would not result in inadequate emergency access. Impacts would be **less than significant**.

Operation

Emergency vehicles currently access the Project Site at three existing driveways, which are located on Mission Road, Marengo Street, and Zonal Avenue. All new access driveways would be designed according to relevant City or County standards and department review, and pedestrian pathways in the Project Site would include retractable bollards that can be lowered to allow vehicle access. As such, all circulation improvements would be designed to maintain sufficient ingress and egress for emergency access.

Emergency service providers are located less than two miles from the Proposed Project. Los Angeles General Medical Center is located within the Project Site. The nearest fire station (Los Angeles City Fire Department Station 2) is one mile south of the Project Site on East Cesar Chavez Avenue. The nearest police station (Los Angeles Police Department, Hollenbeck Community Police Station) is approximately 1.4 miles south of the Project Site on 1st Street. The Proposed Project would not affect the travel distances to or from these facilities. In addition, emergency access to land uses surrounding the Project Site would not be affected, as Proposed Project operations would not restrict existing driveways for surrounding land uses or block roadways used to access surrounding land uses. Between internal site access and broader emergency services network, the Proposed Project would not result in inadequate emergency access and would thus have a **less-than-significant** impact.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.15.5 Cumulative Impact Analysis

This section evaluates the cumulative impacts of past, present, and reasonably foreseeable probable future projects in combination with the Proposed Project's effects to determine if the Project would have a cumulatively considerable contribution to a significant cumulative impact on ground transportation. The geographic study area for the transportation cumulative analysis r includes planned cumulative projects within a one-mile radius of the Project Site. The cumulative projects within the one-mile radius include the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). The full list of 13 cumulative projects is shown in Table 3-2, *List of Cumulative Projects*, in Chapter 3, *Environmental Analysis*.

Would the project have a cumulative effect related to transportation?

CONFLICTS WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would conflict with a program, plan, ordinance, or policy addressing the circulation system during construction. Construction activities associated with the Proposed Project would be temporary and would not result in changes to land uses at the Project Site. However, Proposed Project and the other cumulative project construction activities could result in temporary closures of public rights of way. Cumulative impacts could be potentially **significant.**

Impact TRA-5: Construction of the Proposed Project, together with other past, present and reasonably foreseeable projects, could create potentially significant impacts to programs, plans, ordinances, or policies addressing the circulation system during construction.

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measure TRA-1 would reduce impacts to less than significant levels. The Worksite Traffic Control Plan would account for the phased development of the Proposed Project as appropriate. This includes any necessary adjustments in accordance with the location of current and planned construction activity. Therefore, the Proposed Project's contribution to a cumulative impact on programs, plans, ordinances, or policies affecting the circulation system would not be cumulatively considerable. Thus, cumulative impacts would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would conflict with a program, plan, ordinance, or policy addressing the circulation system during operation. As described in Section 3.15.4, *Project Impacts Analysis*, the Proposed Project would not conflict with applicable programs, plans, ordinances, and policies related to the circulation system. Therefore, the Proposed Project's contribution to a cumulative impact on programs, plans, ordinances, or policies affecting the circulation system would not be cumulatively considerable and, thus, the cumulative impact would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

CONFLICTS OR INCONSISTENCY WITH CEQA GUIDELINES SECTION 15064.3(B)

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would result in conflict or inconsistency with State CEQA Guidelines Section 15064.3(b) during construction. Construction activities associated with the Proposed Project and other cumulative projects would generate temporary trips that are not characteristic of the Proposed Project and other cumulative projects. The Proposed Project and other cumulative projects are in an urbanized area in proximity to transit and alternative routes, which could minimize VMT associated with construction workforce. Additionally, the Proposed Project exists in a centralized location relative to the regional workforce and in proximity to multimodal transportation facilities. Therefore, the Proposed Project's contribution to a cumulative impact related to conflicts or inconsistencies with State CEQA Guidelines Section 15064.3(b) would not be cumulatively considered. Thus, the cumulative impact would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would conflict or inconsistency with State CEQA Guidelines Section 15064.3(b) during operation. Pursuant to the County's TIA Guidelines, cumulative effects of the Proposed Project are determined through consistency with the SCAG RTP/SCS, which analyzes travel behavior and land use data to establish regional development and transportation strategies to meet state and federal air quality requirements and GHG reduction targets. Projects that are consistent with RTP/SCS goals are presumed in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Proposed projects that are deemed to be consistent with the RTP/SCS would have a less-than-significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation.

The Proposed Project is located within two types of PDAs as identified in the 2024 SCAG RTP/SCS: Transit Priority Areas and Livable Corridors. PDAs are defined in the 2024 SCAG RTP/SCS as areas within the SCAG region where future growth can be located to help the region reach Plan goals. Individuals in PDAs have access to multiple modes of transportation or have trip origins and destinations closer together, allowing for shorter trips and lower VMT. The Project Site's location within two PDAs suggests that the Proposed Project is consistent with the 2024 SCAG RTP/SCS.

Pursuant to the County's TIA Guidelines, because the Proposed Project is consistent with the SCAG RTP/SCS, it would not conflict with State CEQA Guidelines Section 15064.3(b). Therefore, the Proposed Project's contribution to a cumulative impact would not be cumulatively considerable and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

GEOMETRIC TRANSPORTATION HAZARDS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would result in geometric transportation hazards during construction. The Proposed Project's construction activities would involve the daily staging and transportation of the workforce required to develop the Proposed Project. As with the Proposed Project, the construction activities of other cumulative projects may require roadway restrictions, land closures, and similar actions, which could create non-standard road geometry and land configurations. The Proposed Project's construction activities, together with other cumulative project, could be incompatible with surrounding land use and roadway function. Cumulative impacts could be potentially **significant**.

Impact TRA-6: The Proposed Project's construction activities, together with past, present, and reasonably foreseeable projects, have the potential to result in transportation hazards during construction.

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. Because the Proposed Project is expected to implement a Worksite Traffic Control Plan as part of MM TRA-1, follow all Caltrans and FHWA design standards, secure required permitting for any oversized truck trips, and coordinate with Los Angeles Unified School District regarding pedestrian access to schools, construction activity would not increase hazards due to geometric design features or incompatible uses. Therefore, the Proposed Project's contribution to a cumulative impacts would not be cumulatively considerable and cumulative impacts would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, would result in geometric transportation hazards during operation. As described in Section 3.15.4, *Project Impact Analysis*, the Proposed Project would result in a significant and unavoidable impact to geometric transportation hazards under operational conditions, even after implementation of

Mitigation Measures TRA-3a through 3e. Given this conclusion, the Proposed Project would contribute to a cumulative impact on geometric transportation hazards and would constitute a cumulatively **significant and unavoidable** impact.

Impact TRA-7: Because the Proposed Project's operational traffic impacts are significant, the Proposed Project's contribution to cumulative geometric transportation hazards is considered cumulatively considerable.

Mitigation: Implement Mitigation Measures TRA-3a through TRA-3e.

Significance with Mitigation: Significant and unavoidable. Because the Proposed Project's results in a significant and unavoidable impact to geometric transportation hazards, the Proposed Project's contribution to cumulative transportation hazards is considered cumulatively considerable. While implementation of Mitigation Measure TRA-3a through TRA-3e would reduce impacts, it would not reduce transportation hazards impacts to a less than significant level. Impacts would be **significant and unavoidable**.

EMERGENCY ACCESS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonable foreseeable projects result in substantially inadequate emergency access during construction. As discussed under impact discussion (a), the Proposed Project's construction activities could require temporary road or lane closures that would close or restrict ingress and egress to the Project Site. Such restrictions could alter existing emergency access. Therefore, the Proposed Project could contribute to a cumulative impact related to emergency access. Cumulative impacts would be potentially **significant**.

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

Mitigation: Implement Mitigation Measure TRA-1.

Significance with Mitigation: Less than significant. With the implementation of Mitigation Measure TRA-1, which would require the implementation of a Worksite Traffic Control Plan, emergency vehicle access would be maintained during construction. Therefore, the Proposed Project would not contribute cumulatively to impacts related to emergency vehicle access. Thus, with the implementation of mitigation, cumulative impacts would be **less than significant**.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects result in substantially inadequate emergency access during construction. As discussed in Section 3.15.4, *Project Impact Analysis*, the Proposed Project would not affect travel distances to or from emergency service facilities, nor would it restrict existing driveways or block roadways used to access surrounding land uses. Between the internal site access and broader emergency services network, the Proposed Project would not result in inadequate emergency access. Therefore, the Proposed Project's contribution to a cumulative impact on emergency access would not be cumulatively considerable and thus the cumulative impact would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.15.6 Comparison to the 2014 Master Plan EIR

As described in Section 3.15.4, *Project Impact Analysis*, and 3.15.5*, Cumulative Impact Analysis*, the Proposed Project would result in a Proposed Project-level and a cumulative level significant and unavoidable impact related to geometric transportation hazard during operation. The Proposed Project's other impacts related to construction and operational transportation activities would be less than significant with or without mitigation.

As shown in Table 3.15-1, *Summary of the 2014 Master Plan EIR Transportation Impact Conclusions*, the 2014 Master Plan EIR concluded that the 2014 Master Plan would result in significant and unavoidable impacts related to intersection LOS during operation. As previously described, since the certification of the 2014 Master Plan EIR, the State CEQA Guidelines were updated in December 2018. As part of the update, the environmental checklist in Appendix G of the State CEQA Guidelines was revised. With respect to transportation, the update to Appendix G revised the transportation section to align with Senate Bill 743 and shift from LOS to VMT as the primary metric for evaluating transportation impacts. As a result, the prior checklist questions related to congestion, intersection operations, and roadway capacities were removed. These changes reflect the State CEQA Guidelines' transition away from analyzing delay-based impacts and towards evaluating how projects influence overall travel behavior and GHG emissions. Therefore, based on updated significance criteria, the Proposed Project would not result in the significant impacts identified in the 2014 Master Plan EIR. Mitigation Measures TRAF-1 through 3 from the 2014 Master Plan EIR are no longer applicable under CEQA. The County would continue coordination with the City of Los Angeles to ensure that any off-site roadway circulation changes resulting from the Proposed Project are adequately addressed.

3.15.7 References

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3.16 TRIBAL CULTURAL RESOURCES

This chapter of the Draft SEIR discusses the potential impacts related to tribal cultural resources from implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce significance of impacts. This chapter also describes the Project Site's tribal cultural setting and identifies applicable regulatory requirements. Preparation of this analysis was informed by consultation with tribes as discussed below, and in part by the following cultural resource assessment prepared for the Project Site:

- *Phase I Cultural Resource Assessment, Los Angeles County General Hospital Master Plan, Los Angeles County, CA*, prepared by Envicom Corporation for Centennial GH Partners, April 2026 (Appendix E.1 of this Draft SEIR)
- *Tribal Consultation, compiled by PlaceWorks, May 2026 (Appendix K of this Draft SEIR)*

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, one comment from the Native American Heritage Commission (NAHC) was received regarding impacts on tribal cultural resources associated with the Proposed Project. The comment provides recommendations for consultation with California Native American tribes and summaries of Assembly Bill (AB) 52 and Senate Bill (SB) 18. A California Environmental Quality Act (CEQA) scoping meeting was conducted on October 8, 2025. No comments regarding these issues were received at the meeting. The NOP and scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*. The comments related to tribal cultural resources were considered in the preparation of this analysis.

Notification of the opportunity for consultation in compliance with AB 52, pursuant to Public Resources Code (PRC) Sections 21074, 21080.3.1, and 21080.3.2, was provided to California Native American tribes traditionally and culturally affiliated with the geographic area to determine whether the Proposed Project may result in impacts to Tribal Cultural Resources. Consultation with one Native American Tribe, as discussed herein, was requested and was completed. Consultation was completed on May 8, 2026.

3.16.1 Regulatory Framework

The Project Site is entirely owned and operated by the County; the County is the public agency involved in development of the proposed Master Plan. The County of Los Angeles is the lead agency for the Proposed Project. Therefore, tribal consultation pursuant to AB 52 as well as all land use decisions on the Project Site pertaining to the Proposed Project fall under the jurisdiction of the County. However, because tribal cultural resources are recognized and protected through both County and City of Los Angeles policies and consultation processes, the

regulatory setting also includes City of Los Angeles policies related to tribal cultural resources for informational purposes.

FEDERAL

National Register of Historic Places

The National Register of Historic Places (National Register) recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. Properties are nominated to the National Register by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands. The criteria for listing in the National Register follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials:

- Associated with events that have made a significant contribution to the broad patterns of history.
- Associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Yield, or may be likely to yield, information important in prehistory or history.

National Historic Preservation Act

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to "preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice." The law makes it illegal to destroy, excavate, or remove from federal or Indian lands any archaeological resources without a permit from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Indian lands remain the property of the Indian or Indian tribe having rights of ownership over such resources.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (U.S. Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal

agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Indian tribes.

American Indian Religious Freedom Act of 1978

The American Indian Religious Freedom Act of 1978 (42 U.S. Code Section 1996) makes it the policy of the United States to "protect and preserve for the American Indians their inherent right to freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians." These rights include, but are not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremony and traditional rites.

STATE

Assembly Bill 52

The Native American Historic Resource Protection Act (AB 52), codified in PRC Sections 21074, 21080.3.1, 21080.3.2, and 21084.2, took effect on July 1, 2015, and requires government-to-government tribal consultation and analysis of impacts to tribal cultural resources into the CEQA process. It required Appendix G of the State CEQA Guidelines to be updated to include tribal cultural resources as a topic to be analyzed, along with new significance criteria. AB 52 also established a consultation process for lead agencies and California Native American tribes for projects that require a notice of preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration. A significant impact on a tribal cultural resource is considered a significant environmental impact and requires feasible mitigation measures.

As defined in the PRC, tribal cultural resources must have certain characteristics:

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources (California Register) or included in a local register of historical resources (PRC Section 21074[a][1]).
2. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (PRC Section 21074[a][2]).

The first category requires that the tribal cultural resource qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it supports its determination with substantial

evidence and consider the resource's significance to a California tribe. Following is a brief outline of the process, paraphrased from PRC Sections 21080.3.1 and 21080.3.2.

1. A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
3. A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, OR a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
6. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

PRC Section 21082.3(c)(1) states that any information, including but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

California Public Resources Code Sections 21073 and 20174

PRC Sections 21073 and 21074 define California Native American tribe and tribal cultural resources, respectively. PRC Section 21073 defines a "California Native American tribe" as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC).

Tribal cultural resources are defined in Section 21074 as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the California Register, or are included in a local

register of historical resources as defined in subdivision (k) of Section 5020.1, or are 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 Section 5024.1.

California Public Resources Code Sections 21083.2(I) and 21084.3

PRC Sections 21083.2(i) and 21084.3 address the treatment of archaeological and tribal cultural resources under CEQA. PRC Section 21083.2 requires that if a project may cause a substantial adverse change in the significance of an archaeological resource, the lead agency must treat that effect as a significant environmental impact. Subsection (i) clarifies that if an archaeological resource also qualifies as a tribal cultural resource, as defined in PRC Section 21074, the provisions of PRC Section 21084.3 also apply. This ensures that both archaeological and tribal cultural values are considered during environmental review.

PRC Section 21084.3 provides direction to lead agencies on actions that may be taken to avoid or mitigate significant impacts to tribal cultural resources. The section encourages lead agencies to establish avoidance and preservation in place as the preferred means of mitigating impacts, where feasible. Other measures may include protecting resources through site capping, reburial protocols, data recovery, or the development of treatment and monitoring plans. In addition, PRC Section 21084.3 emphasizes the importance of consultation between the lead agency and California Native American tribes to identify appropriate measures for preserving, protecting, and mitigating impacts to tribal cultural resources.

California Health and Safety Code

California Health and Safety Code Section 7050.5 requires that, if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to their authorized representative. If the coroner determines that the remains are not subject to their authority and recognizes or has reason to believe the human remains are those of Native American, they shall contact, by telephone within 24 hours, the NAHC.

California Register of Historical Resources

The California Register is the state version of the NRHR program. It was enacted in 1992 and became official on January 1, 1993. The California Register was established to serve as an authoritative guide to the State's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of PRC Section 5024.1, a resource may be listed as a historical resource in the California Register if it meets any of the four NRHR criteria.

LOCAL

As the County of Los Angeles is the owner of the Project Site, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

County of Los Angeles General Plan 2035

The Conservation and Natural Resources Element, most recently updated in 2025, of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) (2025) provides goals and policies relevant to tribal cultural resources (County of Los Angeles 2025). As a County-run facility operated on County-owned land, the County has elected to demonstrate consistency with the applicable policies from the Conservation and Natural Resources element include the following:

Goal C/NR 14: Protected historic, cultural, and paleontological resources.

- **Policy C/NR 14.1.** Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- **Policy C/NR 14.2.** Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- **Policy C/NR 14.5.** Promote public awareness of historic, cultural, and paleontological resources.
- **Policy C/NR 14.6.** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), adopted in 1973, is composed of elements covering various aspects of the urban environment. The City's General Plan has 11 citywide elements and 34 Community Plans. The Project Site is in the Northeast Los Angeles Community Plan area; this community plan is discussed below. The Framework Element is the General Plan's organizing element and connects all the elements. The Framework Element was originally approved in 1996 and was re-adopted in 2001. The Conservation Element, adopted in 2001, establishes objectives, policies, and programs for the protection of archaeological, paleontological, historical, and cultural resources (City of Los Angeles 2001). The following are applicable objectives and policies related to tribal cultural resources.

Section 3 Objective: protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.

- **Policy.** continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.
  - **Program.** permit processing, monitoring, enforcement and periodic revision of regulations and procedures.

Section 5 Objective: protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

- **Policy.** continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.
  - **Program.** development permit processing, monitoring, enforcement and periodic revision of regulations and procedures.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan area encompasses the hills and valleys east of the Los Angeles River and north of the Boyle Heights Community Plan area in the City (City of Los Angeles 1999). The following are applicable objectives and policies related to tribal cultural resources.

Objective 14-1: to ensure that the Plan Area’s significant cultural and historical resources are protected, preserved and/or enhanced.

- **Policy 14-1.2.** Identify all designated City of Los Angeles Historic and Cultural Monuments in order to foster public appreciation of the City of Los Angeles' valuable historic resources and to promote education of the public by preserving Los Angeles' historic past and to promote that any other appropriate landmarks of unique architectural and historical significance continue to be identified for the purpose of inclusion in the list.

3.16.2 Existing Conditions

NATIVE AMERICAN ETHNOGRAPHIC SETTING

The northern Los Angeles region was historically occupied by a number of different tribal groups, each with different material cultures as described by archaeologists and the ethnographic record. The northern Los Angeles Basin area was mostly controlled by the Gabrielino Tongva people. To the west, were the Chumash with a major Chumash village located at Malibu. The San Fernando Valley was mostly controlled by the Gabrielino Tongva tribal group,

who centered on the Los Angeles Basin area to the south. The Gabrielino Tongva people shared a rough border with the Chumash tribal group to the west around the Topanga Canyon area, and with the Tataviam tribal group to the north along the northern edge of the San Fernando Valley (Envicom 2026 [Appendix E.1]).

The Project Site is located within the traditional use area of the Gabrielino Tongva (Gabrieleño San Gabriel Band of Mission Indians 2024). The Gabrielino Tongva originally inhabited portions of coastal and inland California. The Gabrielino Tongva occupied the entirety of Los Angeles basin and the Santa Catalina, San Nicolas, San Clemente, and Santa Barbara islands, today referred to as the Southern Channel Islands. The Gabrielino Tongva call the City of Los Angeles Tovaangar (City of Los Angeles 2025).

The Gabrielino Tongva are characterized as one of the most complex native societies in Southern California. This complexity derives from their overall economic, ritual, and social organization (Bean and Smith 1978). The Gabrieleño Tongva slept in what they called “kiys,” brush shelters constructed of staked willow poles thatched with layers of dried tule reeds. Rabbit skin mats provided bedding and small fires kept the occupants warm. The Gabrieleño Tongva were hunters and gatherers who lived directly off the land. Acorns from California oaks were the staple of their diet, supplemented by small game and native nuts, seeds, and berries (City of Los Angeles 2025). The Gabrieleño Tongva made weapons from stone and wood, and cooking vessels from soapstone and basketry. They used animal parts, plants, trees, stones, and shells from the area as tools, using each material for its strength, sharpness, and flexibility. They carved wood and shaped it specially for handles, paddles, spoons, and arrows. They used the strong and flexible fiber of plants for making rope, baskets, and nets. The Tongva did not have written language or use characters for communication. The tribal storytellers were the keepers of folklore and the past. The chief (tomyaar) trained young boys as storytellers and they memorized the stories word for word. The discipline of repetition kept the stories intact and accurate for centuries (City of Los Angeles 2025).

The Gabrielino first encountered Europeans in 1542 when the Spanish conquistador Juan Rodriguez Cabrillo and his crew entered Gabrielino territory. In 1771, the Gabrielino Tongva were captured and used as slave labor to construct the Mission San Gabriel (in the present-day City of San Gabriel). Outbreaks of smallpox, syphilis, diphtheria, chickenpox, and measles spread through the Native populations across California, widely decimating the population as Native Americans did not possess natural immunities to ward off European diseases. These diseases, brought by the European colonizers, were made worse by the Mission system. Under the Spanish Mission system, enslaved natives were forced to endure excessive demanding labor without the nutrition they needed and were unable to sustain under confinement of the Mission.

In the immediate post-Mission era, although the Gabrielino Tongva were no longer enslaved, the creation of ranchos and the arrival of immigrants from Mexico and the U.S. continued to

oppress and further subjugate them. By the time that Pio Pico was governor in 1845, the population of Natives had plummeted. Simultaneously, the population of permanent California residents was rising (City of Los Angeles 2025).

One major ethnographic Gabrielino village close to the Project Site was the village of Yaanga'na, one of the largest Gabrielino villages in the region. The precise location of Yaanga'na is uncertain, but it was most likely located adjacent to what would become the Los Angeles Plaza (City of Los Angeles 2025). This would place the village approximately 1.5 miles west of the Project Site. The village of Yaanga'na was later instrumental in the founding of El Pueblo de Los Angeles because the Spanish colonial governor wanted a Native American village population to support the new civil community with labor and materials (County of Los Angeles 2014). The nearby Los Angeles River and its embankment areas were rarely used by the indigenous people of Southern California for permanent habitation locations. Historically, they favored smaller, more predictable water sources, especially from springs or better watered smaller streams that would not be a danger during flash flood events. The distance from the river provided safety from possible flooding events that were a common risk during California's rainy season (Envicom 2026 [Appendix E.1]).

A Sacred Lands File (SLF) search conducted by the NAHC returned positive results, indicating the presence of a tribal cultural resource within 0.5 miles of the Project Site (Envicom 2026 [Appendix E.1]).

3.16.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XVIII, states that the Proposed Project would result in a significant impact related to tribal cultural resources if it would:

a) Cause 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:

   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).

   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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

At the time the 2014 Master Plan EIR was certified, the topic of tribal cultural resources was not a separate environmental topic in Appendix G of the State CEQA Guidelines (became effective January 1, 2019). Although the significance criteria identified above represent new Appendix G questions, impacts to tribal cultural resources do not represent a new environmental impact. Impacts to tribal cultural resources were addressed in the Cultural Resources section of the 2014 Master Plan EIR.

METHODOLOGY

Envicom conducted a record search of the California Historical Resources Information System (CHRIS) database at the South Central Coastal Information Center (SCCIC) for Los Angeles County on July 23, 2025, and obtained the records for all cultural resource sites and reports previously completed for the Project Site and for the surrounding 0.5 mile radius. Additionally, a request was made to the NAHC on July 15, 2025, to search their SLF for tribal cultural resources that are located on or within the Project Site or the surrounding 0.5 mile radius (Envicom 2026 [Appendix E.1]). The 0.5-mile search radius was selected consistent with standard professional practice for cultural resources assessments in urbanized settings and in accordance with SCCIC record search parameters commonly used for projects of similar scale. This radius is considered sufficient to understand potential sensitivity for encountering subsurface resources, and to address both direct and indirect impacts.

NATIVE AMERICAN CONSULTATION

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

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

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

The County began consultation via email with representatives of the Gabrieleño Band of Mission Indians–Kizh Nation on November 19, 2025. The Kizh Nation provided recommended mitigation measures tailored to the tribe's cultural protocols on January 22, 2026 via email. The County provided suggested revisions to the provided mitigation measures on March 3, 2026 via email. On March 17, 2026, the tribe provided comments on the County's proposed revisions to the mitigation measures. The County has considered all information provided by the Kizh Nation during the consultation for the Proposed Project. After acting in good faith and in consideration of the Tribe's requests and multiple rounds of emails and edits to the draft mitigation measures, the County concludes that a reasonable effort has been put forth and the County and the tribe have been unable to reach a mutual agreement regarding the mitigation measure language (PRC Section 21080.3.2[b]). An email and letter was sent via certified mail to Mr. Andrew Salas of the Gabrieleño Band of Mission Indians—Kizh Nation on May 8, 2026, concluding consultation pursuant to PRC Section 21080.3.2(b).

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update to the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project in Section 3.16.4, *Project Impact Analysis*, and 3.16.5, *Cumulative Impact Analysis*. At the time that the 2014 Master Plan EIR was prepared, the California legislature had not yet passed AB 52 and Appendix G of the State CEQA Guidelines did not include tribal cultural resources as a stand-alone topic. AB 52 went into effect on July 1, 2015, and applies to projects for which an NOP was filed on or after July 1, 2015. The NOP for the 2014 Master Plan EIR was published May 19, 2014 and, therefore, the lead agency was not required to comply with the requirements of AB 52. However, the 2014 Master Plan EIR addressed the Native American ethnographic setting of the project area in the Cultural Resources section of the 2014 Master Plan EIR and identified that no tribal cultural resources were known to be present in the immediate vicinity (0.25 miles) of the Campus. Ground-disturbing activities assumed in the 2014 Master Plan EIR includes excavation for activities including but not limited to demolition, new foundations, new construction, utilities, and access routes, which may impact previously unidentified subsurface resources. While the phrase “tribal cultural resource” was not explicitly used in the 2014 Master Plan EIR, Mitigation Measures MM-CR-8 and MM-CR-10 were identified to reduce impacts to such resources to less than significant levels.

3.16.4 Project Impact Analysis

a) Would the project cause 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:

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)?

A tribal cultural resource is considered a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe (pursuant to PRC Sections 21073 and 21074) and is either eligible for the California Register or a local register of historical resources, as defined in subdivision (k) of PRC Section 5020.1 or determined to be significant pursuant to criteria set forth in PRC Section 5024.1.

Construction

The Proposed Project would involve an increase in development by up to approximately 8.1 million square feet, adaptive reuse of the General Hospital building, demolition of buildings not previously identified for demolition, and the introduction of new uses to the Campus, including residential and educational uses. All construction activities would occur within the boundaries that were analyzed in the 2014 Master Plan EIR.

The Proposed Project's construction activities would include the demolition of buildings and structures on the Project Site. A Sacred Lands File (SLF) search conducted by the NAHC returned positive results, indicating the presence of a tribal cultural resource within 0.5 miles of the Project Site (Envicom 2026 [Appendix E.1]). However, the SLF results did not identify the presence of any known tribal cultural resources that are listed or eligible for listing in any register of historical resources. Additionally, the result of a database record search within the CHRIS database at the SCCIC on July 23, 2025 was positive for three built-environment cultural resources within the Project Site. However, these historical buildings are associated with the hospital campus and are not tribal cultural resources (Envicom 2026). As discussed in Chapter 3.4, *Cultural Resources*, of this Draft SEIR, the Proposed Project would incorporate mitigation measures that would reduce the Proposed Project's potential impacts on historical and archeological resources, which would be consistent with LA County General Plan 2035 Policies C/NR 14.1, 14.2, 14.5 and 14.6,the General Plan Section 3 and 5 Objectives, and Policy 14.1-2 of the Northeast Los Angeles Community Plan. Although compliance with City policies is not required, the Proposed Project achieves consistency with these standards, offering an added benefit by aligning with local objectives for tribal cultural resource protection.

No known tribal cultural resources listed or eligible for listing in the National Register, California Register, or in a local register of historical resources as defined in PRC Section 5020.1(k) have been identified on the Project Site or in the immediate vicinity. Although, the Proposed Project's construction activities would result in the demolition of buildings and structures of historic age, these buildings and structures are not listed or eligible for listing in the California Register or in a local register, other than the General Hospital Building, which is not a tribal cultural resource. The Proposed Project's construction activities would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k). Therefore, construction impacts would be **less than significant.**

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Proposed Project would include ongoing operation and maintenance that could involve ground-disturbing activities; however, such activities would be limited in comparison to overall construction (i.e., landscaping, utility maintenance, etc.). As discussed, there are no known

tribal cultural resources listed or eligible for listing in the National Register, California Register, or in a local register of historical resources on the Project Site or within 0.25 mile. Thus, operational impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

CONSTRUCTION

The Proposed Project would result in up to approximately 8.1 million square feet of development, including adaptive reuse of the 1.2 million square foot General Hospital building, demolition of buildings not previously identified for demolition, and the introduction of new uses to the Campus, including residential and educational uses. All construction activities would occur within the boundaries that were analyzed in the 2014 Master Plan EIR. Ground-disturbing activities would include demolition, excavation for new foundations, new construction, utilities, and access routes, which could potentially affect previously unidentified subsurface resources. The grading strategy for the Proposed Project would be designed to closely balance the tiered grades of the existing topography, accommodate the needs of the proposed building program, and provide improved circulation and ADA access throughout the Project Site. The Proposed Project includes site grading and would use excavated fill to reduce slopes along primary streets to less than five percent.

The Project Site is in a highly urbanized area of the City of Los Angeles and is completely developed with the exception of limited ornamental vegetation and some areas of exposed hillside. The Project Site has been previously disturbed by grading, utility installation, and building construction. Based on the site exploration conducted by Geotechnologies, Inc. (see Appendix F.6), the depth of artificial imported fill throughout the Project Site varies widely. Some areas are underlain with bedrock, which limits the potential to discover native soils, while other areas are underlain with artificial fill. Therefore, there is the potential for ground-disturbing activities to encounter previously unknown tribal cultural resources.

All ground-disturbing activities associated with implementation of the Proposed Project would be required to be conducted in compliance with the National Historic Preservation Act, Archaeological Resources Protection Act, American Indian Religious Freedom Act, Native American Graves and Repatriation Act, and the California Health and Safety Code, which

generally require that any ground disturbance must cease in the event of accidental discovery of resources or disturbance to human remains during construction activities. In addition, PRC Section 21083.2(i) and 21084.3 authorizes the adoption of mitigation measures developed in consultation with California Native American tribes to avoid or minimize significant impacts to tribal cultural resources in accordance with AB 52.

In the event of accidental discovery of human remains, California Health and Safety Code Section 7050.5 and State CEQA Guidelines Section 15064.5 require that there be no further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent human remains. These regulations require the Medical Examiner to be contacted and to make a determination as to whether an investigation into the cause of death is required and whether the remains are Native American. If the remains are determined to be Native American, the Medical Examiner shall contact, by telephone within 24 hours, the NAHC. The NAHC shall identify the person(s) it believes to be the most likely descendent, and the most likely descendent may make recommendations regarding proper treatment and burial, which would be implemented in accordance with Section 15064.5 of the State CEQA Guidelines.

Although the Project Site has been modified through decades of previous uses, ground-disturbing activities as part of the Proposed Project have the potential to disturb native subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. Any grading beneath existing artificial fill could reach previously undisturbed soils where buried cultural resources may exist. The County, as lead agency, may in its discretion and supported by substantial evidence, determine that such resources are significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. Therefore, this impact is potentially **significant.**

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

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

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

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

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

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

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

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

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

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

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

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

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

Significance with Mitigation: Less than significant. Implementation of Mitigation Measures TCR-1a through TCR-1c would reduce potential construction-related impacts on tribal cultural resources by requiring Native American monitoring during ground-disturbing activities and establishing procedures for the treatment of unanticipated discoveries. Tribal monitoring during construction would facilitate the identification of previously unidentified tribal cultural resources and allow for coordination between the Native American Monitor, qualified archaeologist, and the Project Applicant if resources are encountered. In the event that a tribal cultural resource or Native American human remains are discovered, construction in the vicinity of the find would cease until the resource has been evaluated and appropriate treatment measures are developed in consultation with the Tribe and in accordance with applicable State regulations. These Mitigation Measures would ensure that potential tribal cultural resources are identified and appropriately managed during construction, thereby minimizing the potential for inadvertent disturbance. Therefore, impacts related to the disturbance of previously unidentified tribal cultural resources during construction would be reduced to a **less-than-significant** level.

OPERATION

While the Proposed Project would result in an increase in approved development and would introduce residential and educational uses to the Campus, the Proposed Project's operational conditions are not anticipated to substantially differ from the operating conditions analyzed in the 2014 Master Plan EIR.

Operation could also involve minor ground disturbance associated with ongoing operations, maintenance, and repair activities. These activities would occur within the already developed Campus and would generally be limited to superficial, small-scale ground disturbance, such as

utility repairs, landscape maintenance, or minor replacement of hardscape. As previously described, the Project Site has been extensively disturbed by previous grading, utility installation, and building construction. Given these conditions, routine operations and maintenance activities are not expected to extend into native or previously undisturbed soils where tribal cultural resources could occur.

Operational activities would also be required to comply with all applicable federal, state, and local regulations that govern the treatment of inadvertent discoveries, including procedures under the National Historic Preservation Act, the California Health and Safety Code, and State CEQA Guidelines Section 15064.5. Compliance with these requirements would constitute appropriate protection and treatment of any unanticipated tribal cultural resources or human remains encountered during operation.

Accordingly, because operational ground disturbance would be limited, would occur in areas of previous disturbance, and would be subject to regulatory requirements in the event of an inadvertent discovery, the potential for operations to impact tribal cultural resources is low. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.16.5 Cumulative Impact Analysis

The geographic study area used to assess potential cumulative tribal cultural impacts consists of the Project Site and the immediate surrounding area within approximately 1.5 miles, that encompasses the 13 cumulative projects identified in Chapter 3, *Environmental Analysis*, which consists of the neighborhoods of Boyle Heights, Lincoln Heights, and Chinatown. This cumulative study area includes areas where ground-disturbing activities associated with prior and planned development are most likely to intersect with or affect tribal cultural resources, based on known resource distributions and prior survey efforts. This cumulative study area is similar to the study area identified in the 2014 Master Plan EIR in the Cultural Resources section, which identified the Campus and immediate surrounding neighborhood; the surrounding neighborhoods include the neighborhoods of Boyle Heights, Lincoln Heights, and Chinatown. The full list of 13 cumulative projects applicable to the Proposed Project's cumulative analyses is provided in Chapter 3, *Environmental Analysis*, and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

As discussed, the 2014 Master Plan EIR did not analyze tribal cultural resources as a distinct environmental issue because it was prepared prior to the adoption of AB 52 and the inclusion of tribal cultural resources as a required CEQA topic area. Consequently, the certified EIR did not identify or determine cumulative impacts associated with tribal cultural resources, specifically. However, the Cultural Resources section of the 2014 Master Plan EIR included a cumulative analysis that determined impacts on archeological resources, encompasses resources

associated with tribes. In accordance with current CEQA requirements, this Draft SEIR includes a focused analysis of potential cumulative impacts to tribal cultural resources.

Would the project have a cumulative effect related to tribal cultural resources?

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the region, substantially increase impacts to tribal cultural resources during construction. Although tribal cultural resources are site-specific with regard to any given resource (e.g., resources of important cultural value to Native Americans), impacts may be considered cumulatively considerable simply because they relate to the loss of tribal cultural resources in general over time throughout the region. No tribal cultural resources listed or eligible for listing in the California Register or in a local register of historical resources as defined in PRC Section 5020.1(k) have been identified in the Project Site or within 0.25 mile. However, the results of the SLF search by the NAHC indicate the presence of a tribal cultural resource within 0.5 miles of the Project Site. Although the potential for encountering tribal cultural resources on the Project Site is very low, construction involving ground-disturbing activities have the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. Therefore, cumulative impacts are potentially **significant.**

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

Mitigation: Implement Mitigation Measure TCR-1a through TCR-1c.

Significance with Mitigation: Less than significant. While the cumulative geographic study area has experienced substantial development which may have resulted in the loss of tribal cultural resources, the available records do not indicate that the Project Site contains known tribal cultural resources or that the Proposed Project would meaningfully contribute to a cumulatively considerable impact. Adherence to State requirements would reduce the potential for impacts to tribal cultural resources. In addition, implementation of Mitigation Measures TCR-1a through 1c would ensure that any tribal cultural resources encountered on the Project Site are handled appropriately. As previously discussed, operational impacts to tribal cultural resources would be less than significant and would not be cumulative considerable. Therefore, the Proposed Project would not be cumulatively considerable and cumulative impacts would be **less than significant.**

Operation

Cumulative impacts would occur if the Proposed Project, together with the 13 identified cumulative projects and other past, present, and reasonably foreseeable projects in the 1.5 mile geographic study area substantially increase impacts to tribal cultural resources during operation. Operation of the Proposed Project is not anticipated to involve ground disturbance or activities that would affect tribal cultural resources. Once constructed, the Proposed Project would not result in ongoing impacts to subsurface resources of alter access to known tribal cultural resources. As such, the Proposed Project would not contribute to cumulative impacts. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.16.6 Comparison to the 2014 Master Plan EIR Impact Analysis

The 2014 Master Plan EIR did not separately analyze the topic of tribal cultural resources. The Native American ethnographic setting of the Project area was addressed in the Cultural Resources chapter of the 2014 Master Plan EIR, which determined impacts to be less than significant with the implementation of mitigation measures MM-CR-8 and MM-CR-10. Ground-disturbing activities under the Proposed Project assume ground-disturbing activities on the entire Project Site, similar to that analyzed in the 2014 Master Plan EIR.

As described in Section 3.16.4, *Project Impact Analysis*, and 3.16.5, *Cumulative Impact Analysis*, the Proposed Project would result in a potentially significant impact that would be reduced to a less-than-significant level with implementation of Mitigation Measures TCR-1a through TCR-1c. As discussed in Chapter 3.4, *Cultural Resources*, of this Draft SEIR, the mitigation measures from the 2014 Master Plan EIR have been reevaluated based on the elements of the Proposed Project, current conditions, and the current regulatory setting. With the enactment of AB 52, tribal cultural resources are now recognized as a distinct CEQA resource requiring independent impact conclusions. Accordingly, this Draft SEIR identifies new mitigation measures specifically designed to address potential impacts to tribal cultural resources. Appendix B*, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures*, lists the mitigation measures of the 2014 Master Plan EIR side by side with the mitigation measures in this SEIR for comparative purposes.

3.16.7 References

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3.17 UTILITIES AND SERVICE SYSTEMS

This chapter of the Draft SEIR discusses the existing utilities and service systems for the Project Site. This chapter also identifies potential impacts that could result from future development and implementation of the Proposed Project and, as necessary, recommends mitigation measures to avoid/reduce the significance of impacts. The analysis presented in this chapter is based on review of publicly available resources. Utilities and service impacts that are associated with energy, steam, and natural gas are discussed in Chapter 3.5, *Energy*, of this Draft SEIR.

During the Notice of Preparation (NOP) public review period, which was from September 26 to November 21, 2025, no comments were specifically received regarding utilities and service systems impacts associated with the Proposed Project. A California Environmental Quality Act (CEQA) scoping meeting was conducted on October 8, 2025, where no comments regarding these issues were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and summarized in Table 1-1, *Summary of Scoping Comments Received*.

As the owner of the Project Site, the County of Los Angeles is the lead agency for the Proposed Project; however, because the Project Site is in the City of Los Angeles and served by utilities and services systems within the City of Los Angeles jurisdiction (i.e., water, sewer, and solid waste), the regulatory setting includes both County and City of Los Angeles utility and services-related policies. The regulatory setting applicable to energy (e.g., electricity, natural gas) supply infrastructure is detailed in Chapter 3.5, *Energy*.

Preparation of this analysis was informed in part by the following assessment:

- *Water Supply Assessment for the Los Angeles County General Hospital Campus Community Plan*. Los Angeles Department Water and Power, Water Resources Division. December 31, 2025. (Appendix H of this Draft SEIR)

3.17.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

Clean Water Act

The Clean Water Act establishes regulations to control the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters (US Code, Title 33, Sections 1251 et seq.). Under the act, the US Environmental Protection Agency (EPA) is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System (NPDES) permit program (EPA 2025b).

Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water for the public, was enacted in 1974 and has been amended several times since it came into law. The Act authorizes the EPA to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and man-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet national standards, it is the water supplier's responsibility to notify its customers (EPA 2025c).

National Pollutant Discharge Elimination System

The NPDES permit program was established in the Clean Water Act to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; set prohibitions on discharges not specifically allowed under the permit; and establish provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

The federal Clean Water Act requires wastewater treatment of all effluent before it is discharged into surface waters. NPDES permits for such discharges in the project region are issued by the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB) (Region 4).

Resource Conservation and Recovery Act (RCRA) (1976)

The Resource Conservation and Recovery Act (RCRA) (42 United States Code [U.S.C.] Section 6901 et seq.) established a comprehensive framework for the management of solid and

hazardous waste, including medical and infectious wastes that exhibit hazardous characteristics. Under RCRA, the U.S. EPA regulates generators, transporters, and treatment, storage, and disposal facilities to ensure proper waste handling and to protect public health and the environment (EPA 2025a). Medical waste that contains hazardous chemical constituents (e.g., solvents, formaldehyde, mercury, pharmaceuticals, or radiological materials) is regulated as a hazardous waste under RCRA and must comply with labeling, storage, and manifesting requirements for hazardous waste management (EPA 2025a).

STATE

State Water Resources Control Board: Statewide General Waste Discharge Requirements

In order to provide a statewide regulatory approach to address sanitary sewer overflows, the State Water Resources Control Board (SWCRB) adopted Statewide General Waste Discharge Requirements for sanitary sewer systems (Order No. 2006-0003- DWQ) in 2006. The Statewide General Waste Discharge Requirements were readopted in December 2022 (Order No. 2022-0103-DWQ). The General Waste Discharge Requirements specify that all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length which collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California need to develop a sewer system management plan (SSMP). The SSMP evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to maintain proper levels of service. It includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models."Provision 14 of Order 2006-003-DWQ requires the SSMP to be updated every five years and shall include any significant program changes. Recertification by the City Council is required when significant updates to the SSMP are made (SWRCB 2006).

General Pretreatment Regulations for Existing and New Sources of Pollution

The General Pretreatment Regulations establish the responsibilities of federal, State, and local governments; industry; and the public to implement National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works or that may contaminate sewage sludge. Pretreatment standards are pollutant discharge limits that apply to industrial users (EPA 2025d).

Assembly Bill 885 (AB 885)

The SWRCB implements regulations to reduce the impact of wastewater sources on groundwater quality in accordance with Assembly Bill (AB) 885 through its water quality control

policy for sitting, design, operation, and maintenance of on-site wastewater treatment systems (OWTS) (septic systems) (Resolution No. 2012-0032). This policy establishes a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements that have affected, or will affect, groundwater or surface water to a degree that makes it unfit for drinking water or other uses or cause a health or public nuisance condition. RWQCBs incorporated the standards in the OWTS policy or standards that are more protective of the environment and public health into their water quality control plans. Implementation is overseen by the State and regional water quality boards and local agencies (e.g., county and city departments and independent districts) (SWRCB 2012).

California Plumbing Code

The California Plumbing Code (Code) is Part 5 of the California Building Standards Code (California Code of Regulations Title 24) and specifies technical standards of design, materials, workmanship, and maintenance for plumbing systems. The Code is updated on a three-year cycle. One of the purposes of the Code is to prevent conflicting plumbing codes within local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems (CBSC 2023). The Code is adopted and enforced locally through the County of Los Angeles Building Code, which incorporates the California Building Standards Code by reference, as adopted and amended by the County of Los Angeles.

Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.), which was passed in California in 1969 and amended in 2013, the SWRCB has authority over State water rights and water quality policy. This Act divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB) to oversee water quality on a day-to-day basis at the local and regional level. RWQCBs engage in a number of water quality functions in their respective regions, including regulating all pollutant or nuisance discharges that may affect either surface water or groundwater (SWRCB 2025). The Project Site is located within the Los Angeles Region (Region 4).

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983 (Water Code Sections 10610 et seq.) requires water suppliers to:

- Plan for water supply and assess reliability of each source of water over a 20-year period in 5-year increments.
- Identify and quantify adequate water supplies, including recycled water, for existing and future demands in normal, single-dry, and multiple-dry years.
- Implement conservation and the efficient use of urban water supplies.

Significant new requirements for quantified demand reductions have been added by the Water Conservation Act of 2009 (SBX7-7), which amended the Urban Water Management Planning Act and adds new water conservation provisions to the Water Code.

Senate Bill 610 (2001) – Water Supply Assessment (California Water Code Sections 10910 – 10915)

Senate Bill (SB) 610 (2001), codified in California Water Code Sections 10910 through 10915, amended State law to ensure better coordination between local water supply and land use decisions and confirm that there is an adequate water supply for new development. Specific projects are required to prepare a water supply assessment (WSA). The WSA consists of information regarding existing and forecast water demands as well as information pertaining to available water supplies for the new development. The following projects are required to prepare a WSA:

- Residential developments consisting of more than 500 dwelling units.
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Hotel or motel, or both, having more than 500 rooms.
- Industrial, manufacturing, or processing plant or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- Mixed-use project that includes one or more of the projects specified above.
- Project that would demand an amount of water equivalent to, or greater than, the amount of water required for 500 dwelling units (CDWR 2003).

The Water Conservation Act of 2009 (Senate Bill X7-7) (Cal. Water Code Sections 10608–10608.64, 10631(e), and 10631.5)

The Water Conservation Act of 2009, SB X7-7, codified in California Water Code Sections 10608 through 10608.64, requires all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for State water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards. (CDWR 2009a).

Assembly Bill 1668 and Senate Bill 606

In 2018, the California Legislature enacted two policy bills to establish long-term improvements in water conservation and drought planning to adapt to climate change and longer and more intense droughts in California. Department of Water Resources (DWR) and the SWRCB will develop new standards for:

- Indoor residential water use
- Outdoor residential water use
- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters
- Water loss

Urban water suppliers will be required to stay within annual water budgets, based on their standards for their service areas, and to calculate and report their urban water use objectives in an annual water use report. For example, the bills define a daily standard for indoor residential use of 55 gallons per person until 2025, when it decreases to 52.5 gallons and further decreases to 50 gallons by 2030. The legislation also includes changes to UWMP preparation requirements (CDWR 2018).

State Water Resources Control Board General Construction Permit

The SWRCB adopted the revised Statewide Construction General Permit on September 8, 2022 (Order WQ 2022-0057-DWQ), which became effective on September 1, 2023. Under the terms of the permit, applicants must file Permit Registration Documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants must also demonstrate conformance with applicable best management practices (BMP) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the Project Site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a weekly visual monitoring program and BMP inspections prior to, during, and after qualifying precipitation events. Water quality monitoring is also required with a schedule based on the risk level of the site (SWRCB 2022).

Water Conservation in Landscaping Act of 2006

The Water Conservation in Landscaping Act (AB 1881) required the DWR to update the State of California's Model Water Efficient Landscape Ordinance (MWELO). Under AB 1881, cities and counties are required to adopt the State's MWELO or to adopt a different ordinance that is at least as effective in conserving water as the State's MWELO.

The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and to build resiliency for future droughts. The 2015 revisions to the MWELO increased water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture and by limiting the portion of landscapes that can be covered in turf. Each city and county is required to submit annual reports to DWR that document how the agency is achieving compliance with the State MWELO and how many projects were subject to the ordinance during the annual reporting period.

Within the City of Los Angeles Municipal Code Section 99.05.305, Water Reuse System, promotes systems to be graywater ready to supply the irrigation demand as determined by the California Department of Water Resources' Model Water Efficiency Landscape Ordinance (CDWR 2009b).

2015 Update of the State Model Water Efficient Landscape Ordinance (Executive Order B-29-15)

To improve water savings in the landscaping sector, the DWR updated the State Model Water Efficient Landscape Ordinance in accordance with Executive Order B-29-15. The Model Ordinance promotes efficient landscapes in new developments and retrofitted landscapes. The Executive Order called for revising the Model Ordinance to increase water-efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture, and by limiting the portion of landscapes that can be covered in turf.

New development projects that include landscaped areas of 500 square feet or more—including residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review—are subject to the Model Ordinance. The previous landscape-size threshold for new development projects ranged from 2,500 to 5,000 square feet (EDSC 2014).

Health and Safety Code Section 17921.3

Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in the majority of buildings (Justia 2011).

Assembly Bill 75

AB 75 (Public Resources Code Sections 42920-42927) required all state agencies and large state facilities to divert at least 25 percent of all solid waste from landfills by January 1, 2002 and 50 percent by January 1, 2004. The law also requires each State agency and large facility to submit an annual report to the California Department of Resources Recycling and Recovery (CalRecycle) summarizing its yearly progress in implementing waste diversion programs (Justia 2000)

Integrated Solid Waste Management Act (Assembly Bill 939)

AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50 percent of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates. Actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste (CLI 1990)

Mandatory Commercial Recycling Act (AB 341)

AB 341 (2011) (Chapter 476), codified in California Public Resources Code Section 41780.01 and 42649 through 42649.3, established a statewide policy goal of achieving 75 percent recycling, composting, or source reduction of solid waste by 2020. The law also created the Mandatory Commercial Recycling program, which requires businesses generating four or more cubic yards of commercial solid waste per week and multifamily residential developments with five or more units to arrange for recycling services. AB 341 was enacted to reduce greenhouse gas emissions associated with solid waste disposal and support statewide climate and resource conservation goals (CalRecycle 2025i).

Solid Waste Reuse and the Recycling Access Act (AB 1327)

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in Public Resources Code Sections 42900 to 42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, institutional, and residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas is determined by the appropriate jurisdiction's ordinance (CPRC 2005).

Mandatory Organics Recycling Act (AB 1826)

AB 1826, which was enacted in 2014, mandates organic waste recycling for businesses and multifamily dwellings with five or more units. Starting January 1, 2020, all generators of two cubic yards or more of garbage, recycling, and compost combined per week must recycle

organic waste. Organic waste includes food scraps, food-soiled paper waste, yard trimmings, and landscape materials. Organic waste can be recycled through composting, mulching, and anaerobic digestion, which produces renewable energy and fuel. In addition to recycling food scraps, donating surplus food to local food banks can be part of the AB 1826 compliance effort. Multifamily dwellings do not need to have food-waste recycling on-site but must recycle yard and landscape materials (CLI 2014).

California Medical Waste Management Act (MWMA)

The California Medical Waste Management Act (MWMA) (California Health and Safety Code [HSC] Sections 117600–118360) governs the generation, handling, storage, treatment, and disposal of medical waste within the state. The law defines medical waste as waste generated in the diagnosis, treatment, or immunization of humans or animals, including biohazardous waste, sharps, pathological waste, pharmaceutical waste, and trace chemotherapy waste (CDPH 2017). The MWMA requires medical waste generators to register with the enforcement agency, segregate medical waste from other waste streams, and ensure proper containment in leak-resistant, rigid, and labeled containers bearing the universal biohazard symbol (HSC Section 118280; CDPH 2017).

The MWMA also establishes storage time limits and temperature controls for medical waste (up to 7 days at room temperature or 90 days if refrigerated) and mandates treatment at permitted facilities through approved methods such as autoclaving, incineration, or alternative technologies (HSC Sections 118310, 118215; CDPH 2017). Transport of medical waste off-site must comply with HSC Section 118040, which requires the use of registered haulers and tracking documents (“manifests”) from the point of generation to the treatment or disposal facility (FindLaw 2023).

REGIONAL

Groundwater Basins Master Plan

The Water Replenishment District (WRD) of Southern California, in coordination with other basin stakeholders, developed the Groundwater Basins Master Plan. The plan provides a single reference document for parties operating within and maintaining the Coastal Plain of Los Angeles’ West Coast and Central Basins. It guides stakeholders to develop and assess initial concepts for additional recharge and pumping from these basins to utilize the basins fully and reduce dependence on imported water. Furthermore, the plan identifies projects and programs to enhance basin replenishment, increase the reliability of groundwater resources, improve and protect groundwater quality, and ensure that groundwater supplies are suitable for beneficial uses (WRD 2016). The WRD Board of Directors officially certified the master plan on October 6, 2016.

LOCAL

Greater Los Angeles County Integrated Regional Water Management Plan

The purpose of an Integrated Regional Water Management Plan (IRWMP) is to develop a vision and direction for the sustainable management of local water resources in local regions throughout California for a 20-year planning horizon. A major goal of the IRWMP program is to reduce dependence on imported water and, thereby, increase the sustainability and dependability of local water supplies. Major features of the integrated regional water management approach are to foster cooperation and collaboration across institutional boundaries, and to seek multiple benefits when funding projects in order to achieve the greatest benefits for the region (LACSD 2025b).

The Project Site is located in the Upper Los Angeles River subregion. The Upper Los Angeles River also has a subregional Plan to guide the protection and improvement of its water resources.

County of Los Angeles Department of Public Works Hydrology Manual

The County of Los Angeles Department of Public Works' hydrology manual (January 2006) establishes hydrologic design procedures and contains charts, graphs, and tables necessary to conduct a hydrologic study in the County of Los Angeles. The manual contains procedures and standards developed and revised by the Water Resources Division based on historical rainfall and runoff data collected in the county. The hydrologic techniques in the manual apply to the design of local storm drains, retention and detention basins, pump stations, and major channel projects. Standards in the manual govern all hydrology calculations under the County's jurisdiction (County of Los Angeles 2006).

An approved hydrology study is required when a development alters the drainage pattern of a site. Improvements from the existing to proposed condition may also indicate that a hydrology study is required (County of Los Angeles 2025).

Los Angeles Regional Water Quality Control Board

The Los Angeles RWQCB was created as a result of the California Porter-Cologne Water Quality Control Act. The RWQCB issues and enforces NPDES permits in the city and County of Los Angeles, which includes permits for wastewater treatment plants and industrial waste and stormwater discharges. NPDES permits allow the RWQCB to regulate where and how waste is disposed, including the discharge volume and effluent limits of waste and the monitoring and reporting responsibilities of the discharger. The RWQCB is also charged with conducting inspections of permitted discharges and monitoring permit compliance (LARWQCB 2025)

County of Los Angeles Countywide Integrated Waste Management Plan

The County Integrated Waste Management Plan comprises the solid waste reduction planning documents produced by the County and its cities. To assess compliance with AB 939, a Disposal Reporting System was established to measure the amount of disposal from each jurisdiction. Comparing current disposal rates to base year solid waste generation determines whether each jurisdiction complies with the diversion mandate. Additionally, the siting element is a long-term planning document that describes how the County and the cities in the county plan to manage the disposal of their solid waste for a 15-year planning period. The siting element contains goals and policies on a variety of solid waste management issues (County of Los Angeles 2024).

Industrial Waste Control Ordinance

The Industrial Waste Management Division of the Bureau of Sanitation was established to protect the local receiving waters by regulating industrial wastewater discharge to the city's sewer system and by administering and enforcing the Industrial Waste Control Ordinance (Los Angeles Municipal Code Section 64.30) as well as federal EPA pretreatment regulations.

Industrial facilities and certain commercial facilities that plan to discharge industrial wastewater to the City's sewage collection and treatment system are required to first obtain an industrial wastewater permit. Permits are issued when a determination has been made by the Board of Public Works for the City of Los Angeles that the wastewater to be discharged will not violate any provisions of the ordinance, the Board's Rules and Regulations, the water quality objectives for receiving waters established by the California Water Quality Control Board, Los Angeles Region, or applicable federal or State statutes, rules, or regulations.

LA Sanitation & Environment Sewerage Facilities Charge

The Sewer Service Charge is based on metered water use and generates funds for constructing and maintaining wastewater facilities such as sewers and sewage treatment plants, and for treating the sewage that is discharged into the sewer system. The Sewer Service Charge applies to all residential and commercial customers, unless an exemption is granted by the City of Los Angeles Department of Public Works, Bureau of Sanitation. All fees collected pursuant to this section, excluding storm drain revenues, shall be deposited into the Sewer Construction and Maintenance Fund (LADWP 2025a).

County of Los Angeles Code of Ordinances

The County of Los Angeles Code of Ordinances establishes regulations and standards relevant to utilities. The Code of Ordinances establishes the following specific regulations governing utility systems.

- **Title 4, Section 4.62.060 (**Communication user tax): Imposes a tax on electricity and gas users.

- **Title 31** (Green Building Standards Code): Adopts by reference the most current 2013 CALGreen standards.
- **Title 12, Section 12.84.410** (Low Impact Development [LID] Standards): Lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters and other water bodies. Minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other LID strategies. Minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies.
- **Title 20, Section 20.87.010** (Construction and Demolition Debris and Recycling and Reuse): The purpose of this Chapter is to increase the recycling and reuse of construction and demolition debris in Los Angeles County, consistent with the goals of the Countywide Sustainability Plan and the County's Zero Waste Plan, in accordance with the California Integrated Waste Management Act of 1989.
- **Title 20, Section 20.09.010** (Maintaining Existing Water-Efficient Landscapes): All existing landscaped areas within the county in which water is provided to irrigate, including golf courses, greenbelts, common areas, multifamily housing, schools, businesses, cemeteries, parks, and publicly owned landscapes are encouraged to have a landscape irrigation audit at least every five years.
- **Title 22, Section 22.44.1330** (Wireless and Other Telecommunication Facilities): Outlines standards that new wireless telecommunication facilities shall be subject to, in addition to all the other standards of the LCP.

County of Los Angeles General Plan

The County of Los Angeles General Plan 2035 (LA County General Plan 2035) includes goals and policies to ensure development is designed and constructed in accordance with the applicable building codes and engineering requirements that address utility and service systems. As a County-run facility operated on County-owned land, the County has elected to demonstrate consistency with the applicable element as discussed below (County of Los Angeles 2015).

The Public Services and Facilities Element promotes the orderly and efficient planning of public facilities and infrastructure in conjunction with land use development and growth. The following policies from the Public Services and Facilities Element are relevant to the Proposed Project:

- **Policy PS/F 1.1.** Discourage development in areas without adequate public services and facilities.
- **Policy PS/F 1.2.** Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

- **Policy PS/F 1.3.** Ensure coordinated service provision through collaboration between County departments and service providers.
- **Policy PS/F 4.4.** Evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods.
- **Policy PS/F 5.5.** Reduce the County's waste stream by minimizing waste generation and enhancing diversion.
- **Policy PS/F 5.7.** Encourage the recycling of construction and demolition debris generated by public and private projects.

The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts. The following policy from the Land Use Element are relevant to the Proposed Project:

- **Policy LU 5.2.** Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs.

County of Los Angeles Municipal Separate Storm Sewer System Permit

The Proposed Project is subject to the waste discharge requirements of the NPDES Permit No. CAS004004 and the County of Los Angeles MS4 Permit (Order No. R4-2021-0105), which was effective September 11, 2021.

The Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities in Los Angeles County (except Long Beach) are permittees under the MS4 Permit. The permit contains requirements that are necessary to improve efforts to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and achieve water quality standards. This permit requires that runoff is addressed during the major phases of urban development (planning, construction, and operation) in order to reduce the discharge of pollutants from stormwater to the maximum extent practicable, effectively prohibit non-stormwater discharges and protect receiving waters. The MS4 Permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-stormwater management and waste management on construction sites (LARWQCB 2021).

Hyperion Sanitary Sewer System Management Plan

The SSMP has been prepared for the Hyperion Sanitary Sewer System pursuant to the SWRCB's May 2, 2006, Statewide General Waste Discharge Requirements.

Consistent with the City of Los Angeles policy and its mission to protect public health and the environment, the Bureau of Sanitation has adopted and is dedicated to achieving the following broad objectives:

- Repair, rehabilitate, replace, and upgrade system components as/when needed;
- Provide sufficient sewage capacity to accommodate current and projected flows;
- Eliminate all preventable dry-weather overflows;
- Eliminate wet-weather overflows from all storm events less severe than or equal to 10-year design storm;
- Maintain an effective sanitary sewer overflow response plan to mitigate any overflows that do occur in a timely manner;
- Control corrosion and minimize odor releases; and
- Provide operational reliability and flexibility

These objectives correspond with the State General Waste Discharge Requirements (WDRs) provisions which require Enrollees to maintain all parts of the system, provide adequate capacity to minimize sewer overflows, and maintain a plan to respond to and mitigate overflows when they do occur. This SSMP documents how the City's collection system practices are integrated toward the achievement of the above objectives (City of Los Angeles 2017).

City of Los Angeles Sewer System Management Plan

The City of Los Angeles Department of Public Works Bureau of Sanitation (LASAN) prepared the SSMP for the City's three collection systems: Hyperion System, Terminal Island System, and Los Angeles Regional System (Harbor Gateway). LASAN prepared this SSMP pursuant to the SWRCB May 2, 2006, WDRs and amendments thereto, and the Board of Public Works approved it at a public hearing in February 2019 (LASAN 2019).

The SSMP gets updated every five years. The City uses the SSMP update process to identify actions for improving how it manages, operates, and maintains the collection system. This process identifies the tasks and actions that are required to meet SSMP goals and defines and prioritizes them. Resourcing and planning for delivery of the actions identified in the SSMP audit are incorporated into the City's strategic planning process (LASAN 2019).

City of Los Angeles Sewer Allocation (Ordinance No. 166060)

City Ordinance No. 166,060 (Sewer Allocation) limits the annual increase in wastewater flows discharged into the Hyperion Water Reclamation Plant to 5 million gallons per day (mgd). The City of Los Angeles Department of Public Works, Bureau of Engineering Special (LABOE) Order No. SO06-0691 changed the design peak dry weather flow for sanitary sewers from three-quarter depth to one-half the sewer diameter to implement the city-adopted goal of no overflows or diversions from the wastewater collection system (City of Los Angeles 1990).

City of Los Angeles Hyperion Water Reclamation Plant Waste Discharge Requirements

Within the City of Los Angeles, the areas that are serviced by the Hyperion Water Reclamation Plant must follow regulations that are within the National Pollutant Discharge Elimination System (NPDES) permit for the water reclamation plant (Order R4-2023-0033 NPDES Number. CA0109991). This includes the Project Site, which is served by the Hyperion Water Reclamation Plant. Some of the regulations include discharge prohibitions, effluent limitations, and receiving water limitations (LARWQCB 2023).

City of Los Angeles Department of Water and Power Urban Water Management Plan

Effective on January 1, 1984, urban water suppliers are required by State law to submit an UWMP to the State at designated time periods, roughly once every five years. The City of Los Angeles Department of Water and Power (LADWP) is an urban water supplier and therefore updates its UWMP on a five-year basis. The LADWP 2020 UWMP is the most recent adopted UWMP (2021) and has two purposes: (1) the master plan for water supply and resources management consistent with LADWP's goals and policy objectives for its entire service area; and (2) provides full compliance with the requirements of the Urban Water Management Planning Act (LADWP 2021).

LADWP is currently in the process of developing its 2025 UWMP and conducting ongoing outreach efforts to solicit community and stakeholder input in shaping the plan. A draft of the 2025 UWMP is anticipated to be released in early 2026, which will be accompanied by a formal public comment period and public hearings for the public to provide comment on the draft document. 2025 UWMPs must be submitted to DWR on or before July 1, 2026, as required under the Act (LADWP 2025c). Until formally adopted, the 2020 UWMP remains the appropriate document for reference.

One Water LA 2040 Plan

The One Water LA 2040 Plan takes a holistic and collaborative approach to consider all of the City's water resources from surface water, groundwater, potable water, wastewater, recycled water, dry weather runoff, and stormwater as "One Water." Also, the Plan identifies multi-departmental and multi-agency integration opportunities to manage water in a more efficient, cost effective, and sustainable manner. The Plan represents the City's continued and improved commitment to proactively manage all its water resources and implement innovative solutions, driven by the Sustainable City Plan. The Plan helps guide strategic decisions for the City's integrated water projects, programs, and policies (City of Los Angeles 2018).

City of Los Angeles Emergency Water Conservation Plan (Ordinance No. 181288)

The City adopted Ordinance No. 181288 (amendment to Chapter XII, Article I of LAMC) to clarify prohibited uses and modify certain water conservation requirements of the City of Los Angeles Emergency Water Conservation Plan. The purpose of the ordinance is to minimize the effect of a water shortage on the customers of the City of Los Angeles and to adopt provisions that will significantly reduce water consumption over an extended period of time.

The revised Water Conservation Ordinance contains five water conservation "phases," which correspond to severity of water shortage, with each increase in phase requiring more stringent conservation measures. Water conservation phases define outdoor watering restrictions, as appropriate, including sprinkler use restrictions and other prohibited water uses (City of Los Angeles 2010).

LA's Green New Deal

Adopted in 2019, the LA's Green New Deal augments, expands, and elaborates in even more detail the City of Los Angeles' vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals. This plan replaced the "Sustainability pLAn" that was adopted in 2015. Some goals that are pertinent to this chapter are:

- **Zero Waste:** Reduce municipal solid waste generation per capita by at least 15 percent by 2030 and eliminate organic waste going to landfill by 2028.
- **Zero Wasted Water:** 100 percent of all wastewater shall be recycled for beneficial reuse by 2035 (City of Los Angeles 2019).

City of Los Angeles Municipal Code

- **Chapter IX, Article 4, Plumbing Code.** The purpose of this Code is to safeguard health, life, property and public welfare by regulating the design, alteration, construction, installation, repair, and quality of materials for plumbing, fire sprinkler, rainwater piping, standpipe, subsurface drainage piping, swimming pool piping, reclaimed water piping, underground fire-protection piping, and graywater piping systems installed in the City. The plumbing code makes requirements for reducing indoor water consumption, including maximum flow rates for indoor water fixtures, and water efficiency requirements for renovation, redevelopment, and new development.
- **Chapter XII, Article V, Water Efficiency Requirements for New Development and Renovation of Existing Buildings.** This Article imposes water efficiency requirements for new buildings and for new plumbing fixtures in existing buildings to minimize the effect of any water shortages to the customers of the City.

3.17.2 Existing Conditions

This discussion provides information related to water, wastewater, stormwater, solid waste, and telecommunications.

WATER

Water Infrastructure

LADWP provides water to the Project Site at various connection points. As shown in Figure 3.17-1, *Existing Site Utilities*, existing LADWP water delivery mainlines are in the surrounding streets (Marengo Street, Zonal Avenue, Mission Road) which bound the site, and separate connection points for existing buildings and fire hydrants are located along existing abutting roadways and on-site vehicular access roads throughout the property.

The current on-site water service infrastructure includes pipelines ranging in size from 1-inch service lines to 8-inch mains. The water distribution system conveys flow from the off-site main system to the medical center campus main facilities, providing flow to meet domestic water service, fire protection, and irrigation demands. Outside of the Project Site, a 24-inch cast-iron water main located in Marengo Street and laterals provide domestic and fire water connections to the existing buildings in the southern portion of the Project Site.

Water Supply and Demand

As mentioned, LADWP is the water purveyor to the Project Site. Sources of water for LADWP's service area are the Los Angeles Aqueduct (LAA), local groundwater, recycled water, and imported supplemental water purchased from Metropolitan Water District of Southern California (MWD). Water from the LAA and MWD are classified as imported because they are obtained from outside LADWP's service area. Groundwater is local and obtained within the service area.

LADWP plans for projected water demands and variable hydrology through expansion of local water supply programs. These local water supply programs include significant investments in local groundwater, recycled water, stormwater capture, and water conservation and water-use efficiency to diversify LADWP's water supply portfolio. The City's total water usage today is about the same as 50 years ago despite a significant increase in population of over one million people. LADWP completed a Stormwater Capture Master Plan in 2015 to evaluate stormwater capture potential within the City. The City's total baseline amount of stormwater captured is 64,000 acre-feet (AF) per year based on the 2015 Stormwater Capture Master Plan. Under LADWP's current implementation strategy, the total estimated stormwater capture capacity is projected to increase to 150,000 acre-feet per year (AFY) by 2035 (Appendix H).

Table 3.17-1, *Potable Water Supply and Demand Under Normal, Single-Dry, and Multiple-Dry Year 5 Conditions* shows LADWP's demand and supply projections for normal, single-dry, and multiple-dry conditions. As shown in Table 3.17-1, the 2020 UWMP projects that water supplies will be sufficient to meet demand in LADWP's service area through the year 2045 during normal, single-dry year, and multiple-dry year hydrologic conditions.

Table 3.17-1 Potable Water Supply and Demand Under Normal, Single-Dry, and Multiple-Dry Year 5 Conditions

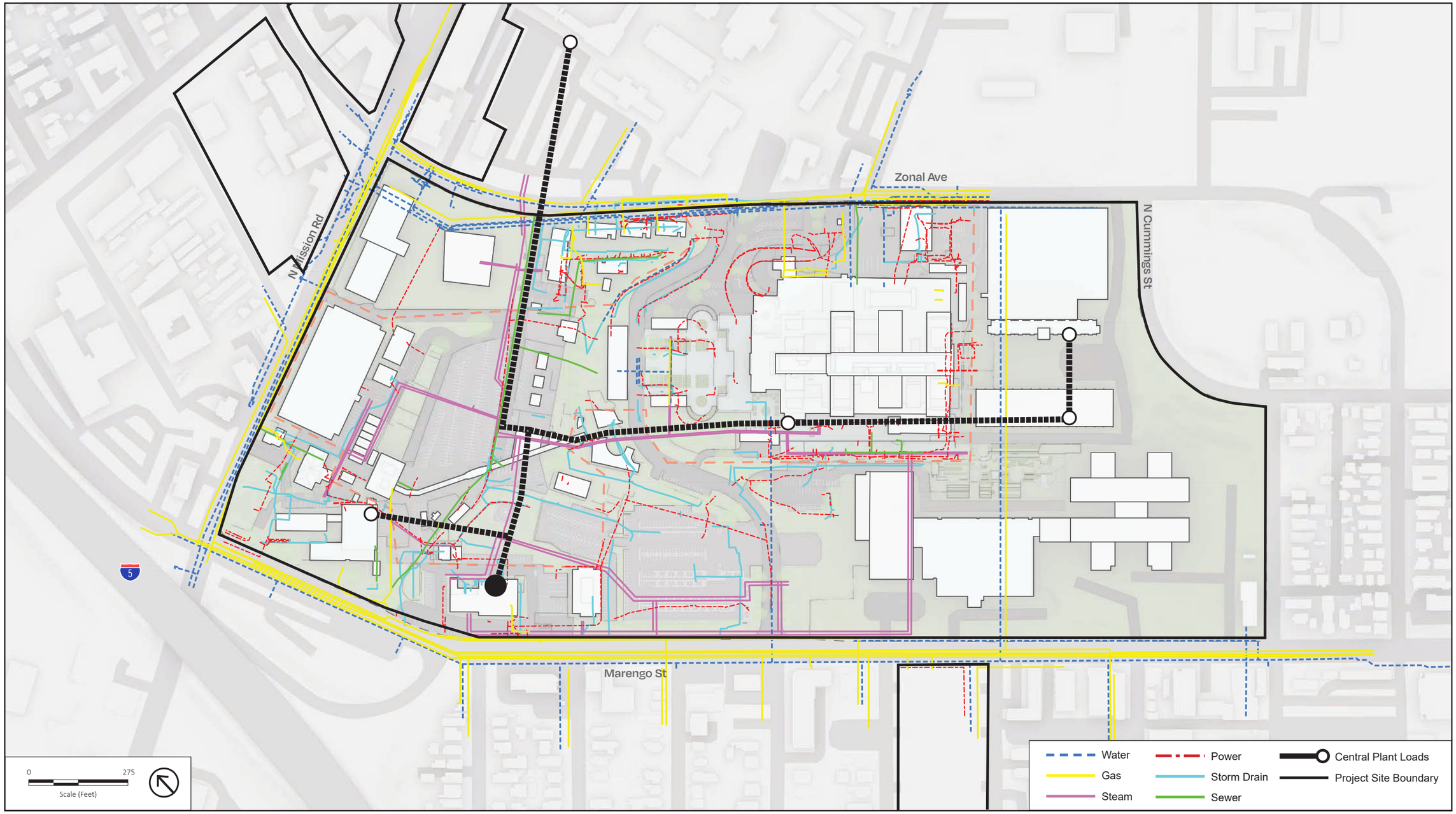
Condition	2025	2030	2035	2040	2045
Normal-Dry Conditions					
Supply	642,600	660,200	678,800	697,800	710,500
Demand	642,600	660,200	678,800	697,800	710,500
Surplus[1]	0	0	0	0	0
Single-Dry Conditions					
Supply	674,700	693,200	712,700	732,700	746,000
Demand	674,700	693,200	712,700	732,700	746,000
Surplus[1]	0	0	0	0	0
Multiple-Dry Year 5 Conditions					
Supply	655,700	673,600	692,600	712,000	724,900
Demand	655,700	673,600	692,600	712,000	724,900
Surplus[1]	0	0	0	0	0

Source: LADWP 2021, LADWP 2026.

Note: Units in acre-feet per year (AFY).

1. The LADWP 2020 UWMP water supply is shown as exactly equal to water demand across all hydrologic conditions because of the LADWP's reliance on supplemental imported water from MWD to fill any supply gaps. LADWP manages its own local supplies (groundwater, recycled water, and the LAA) first. Any remaining demand that these local sources cannot meet is fulfilled by purchasing supplemental water from MWD. MWD's 2025 UWMP indicates that MWD will continue to provide 100 percent supply capability through 2050 for its member agencies during average, single dry, and multiple dry years. In each of these scenarios, there is a projected surplus of supply capability. The projected surpluses are based on the capability of current supplies and range from 258,900 AFY to 2,259,000 AFY.

Figure 3.17-1 - Existing Site Utilities



Source: RIOS 2025.

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Table 3.17-2, *Summary of LADWP Existing and Future Water Supplies*, identifies the existing and future water supplies expected to be utilized by LADWP to meet the projected future demands during a normal year, single dry, and a multi-dry, year 5 scenario (LADWP 2021).

Table 3.17-2 Summary of LADWP Existing and Future Water Supplies

Water Supply Source	2025	2030	2035	2040	2045
Conservation Measures [1]	148,100	147,000	156,500	157,600	159,200
Los Angeles Aqueduct	141,900	140,700	139,500	138,400	137,300
Groundwater					
Entitlements	109,400	109,400	109,400	108,800	108,800
Groundwater Replenishment	7,000	11,000	11,000	11,000	11,000
Stormwater Recharge	4,000	8,000	15,000	15,000	15,000
Recycled Water – Irrigation and Industrial Use	17,300	29,200	29,700	29,800	30,000
MWD Water Purchases with Existing/Planned Supplies	228,000	228,300	231,500	251,400	263,600
Total	**655,700**	**673,600**	**692,600**	**712,000**	**724,900**

Source: LADWP 2021.

Notes: Water quantities are in acre-feet per year (AFY).

1. Conservation accounts for both active and passive water savings features that are implemented by LADWP. Active water saving features could include low-flow fixtures like showerheads and toilets, smart technology for irrigation and monitoring. Passive water features include non-rebated conservation savings from codes, ordinances, and changes in customer behavior due to outreach and educational programs.

Groundwater

Local groundwater is a major component of LADWP's local water supply portfolio. Over the last five years, local groundwater has provided approximately 8 percent of the total water supply for the City, and since 1970 has provided up to 23 percent of the total water supply during extended dry periods when imported supplies were less reliable (LADWP 2021).

Several sources of local groundwater within the Los Angeles area are part of the LADWP water portfolio. The Upper Los Angeles River Area (ULARA) watershed, which includes the San Fernando Basin (SFB) and Sylmar Basin, is the principal groundwater resource where LADWP recharges and extracts local groundwater. The City also owns and extracts its local groundwater rights from the Central Basin and is entitled to produce water from the neighboring West Coast Basin. The unadjudicated Hollywood, Santa Monica, and northern Central Basins are local groundwater resources that do not currently provide groundwater to the City, but there is potential to develop future drinking water supplies for the City from these groundwater basins. In total, the City's groundwater rights can potentially supply more than 110,000 AFY of groundwater (LADWP 2021).

LADWP utilizes various strategies to respond to hydrologic variability to maintain supply reliability for the benefit of its customers. One of these strategies, known as conjunctive use, is storing excess supplies when available to help minimize the impacts of water shortages during future dry periods. LADWP has operated its groundwater resources conjunctively by reducing groundwater pumping and diverting water from the LAA into the Tujunga and Pacoima Spreading Grounds, which are owned and operated by the City and Los Angeles County Flood Control District (LACFCD), respectively. This strategy allows for greater replenishment to the local groundwater basins during wet and normal periods and prevents conditions of severe overdraft when groundwater pumping is increased during dry periods. LADWP also continues to invest in stormwater capture projects as well as water recycling programs to produce advanced treated recycled water for groundwater replenishment (LADWP 2021).

LADWP is implementing its SFB Groundwater Remediation Program to restore access to SFB as a drinking water source and groundwater storage. The SFB groundwater remediation facilities are expected to be complete and operational by 2027. LADWP also receives SFB water through the Los Angeles-Burbank Interim Interconnection Pipeline. In 2015, the City of Los Angeles and the City of Burbank entered into an agreement to construct and operate the Los Angeles-Burbank Interim Interconnection. A temporary delivery to LADWP of a minimum of 500 AF of blended water began in August 2019 and is expected to continue until 2027 when the permanent connection starts construction. The permanent connection is expected to begin service in 2031 to deliver approximately 4,670 AFY of blended water to LADWP (LADWP 2021).

Imported Water

As a member agency of MWD, LADWP purchases water to supplement its supplies from local groundwater, the LAA, and recycled water. LADWP has historically purchased supplemental supplies from MWD to help meet the City's demands. Between fiscal year ending (FYE) 2021 and 2025, MWD purchased water accounted for approximately 54 percent of the City's total water supply. Colorado River supplies, State Water Project supplies, water transfers, and storage and exchange programs together comprise MWD's total system water supply sources (LADWP 2021, Appendix H).

LADWP has historically purchased supplemental MWD supplies to meet demands and maintain reliability. MWD's 2020 Urban Water Management Plan indicates that MWD will continue to provide 100-percent supply capability through 2045 for its member agencies during average (1922 to 2017 hydrology), single dry (1977 hydrology), and multiple dry years (1988 to 1992 hydrology). For each of these scenarios, there is a projected surplus of supply capability in every forecast year (LADWP 2021).

LADWP receives surface water and groundwater from the Eastern Sierra through the LAA. LADWP's water rights in the Eastern Sierra are comprised of riparian rights, pre-1914 appropriations, and post-1914 appropriation licenses held on various streams in the Mono Basin and Owens Valley. The expected annual long term LAA delivery from 2020 to 2045 will range from approximately 184,200 AFY to 192,000 AFY for average hydrologic conditions (Appendix H).

Recycled Water

The City's water recycling program seeks to increase supply of recycled water to offset potable demands where infrastructure is available, and also plans to implement other potable reuse projects such as the Groundwater Replenishment Project and Operation NEXT Water Supply Program. Recycled water is becoming a larger part of the LADWP's overall supply portfolio. LADWP's water recycling program depends on the City's wastewater treatment infrastructure and wastewater treatment facilities located within and outside of the City's boundaries. The City's wastewater system serves 573 square miles, 456 square miles of which are within the City (LADWP 2021).

There is no existing recycled water infrastructure or service on the Project Site.

Recycled water for the larger LADWP service area is derived from wastewater effluent flows, which do not vary significantly due to hydrologic conditions. Therefore, recycled water use is mainly limited by system capacities, infrastructure availability, and potable water demands. LADWP is planning extensive expansion of its recycled water system not only to include expansion of irrigation and industrial uses, but also to include groundwater replenishment. LADWP is working in conjunction with LASAN to develop non-potable reuse projects. LADWP's recycled water use is projected to increase from 50,900 AFY in the year 2025 to 67,600 AFY by FYE 2045, which is inclusive of planned municipal/industrial use, indirect potable reuse (groundwater replenishment), and environmental reuse (Appendix H).

Existing Water Demand

The existing land uses in the Project Site consist of various medical and hospital uses, a childcare center, dormitories, office uses, parking, storage, utilities, warehouse uses, and landscaping. These operations currently generate indoor and outdoor water use. Table 3.17-3, Existing Water

Demand, shows the estimated water demand generated by the existing uses within the Project Site.

Table 3.17-3 Estimated Existing Water Demand

Land Use Type	Square Footage	Conversion Rate	Water Demand Rate (gpd)[4]	Water Demand (gpd)	Number of Operational Days	Water Demand (afy)
Educational	148,100	0.011 students/sf[1]	11 gpd/student	17,962	350	19.29
Hospital	141,900	0.011 bed/sf[2]	70 gpd/bed	144924	365	162.34
Housing	67,500	160 beds[3]	70 gpd/bed	11200	365	12.55
Office	109,400	-	0.17 gpd/sf	52,208	350	56.08
Parking Structure	7,000	-	0.02 gpd/sf	24,925	365	27.92
Storage	4,000	-	0.03 gpd/sf	210	365	0.24
Utilities	17,300	-	0.17 gpd/sf	7,797	365	8.73
Warehouse	228,000	-	0.03 gpd/sf	2,465	365	2.76
Total	**3,786,494**	**-**	**-**	**271,684**	**-**	**301.09**
Landscaping[5]	336,112	-	-	9,991	365	11.19

Angeles 2014, CDWR 2017.

Notes: square foot = sf; gallons per day = gpd; acre-feet per year = afy

1. A proportional rate was used based on the WSA. The WSA considered 1,222 students per 110,000 sf of education building space.

2. A proportional rate was used based on the WSA. The WSA considered 450 beds per 400,000 sf of hospital building space.

3. Number of beds anticipated for the Restorative Care Village.

4. Indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates. The rate for "Utilities" is from the 2014 Master Plan EIR.

5. A Reference Evapotranspiration (Eto) of 48.87 inches and average total precipitation of 13.77 inches was used per the 2021 LADWP UWMP. A plant factor of 0.3 was used per the 2014 Master Plan EIR. The total irrigated square footage is assumed to be half drip irrigation half overhead irrigation. The Estimated Total Water Use is shown in the table.

WASTEWATER

LASAN provides sewer collection services to the Project Site. As shown in Figure 3.17-1, *Existing Site Utilities*, existing infrastructure on the Campus is serviced by various sanitary sewer service

laterals that are collected and directed to existing connections at either the 12-inch public main bisecting the western side of the Campus or connections on Zonal Avenue.

LASAN has three collection systems in its service area that convey wastewater via approximately 6,439 miles of gravity mains, 33 miles of force mains, and 46 pumping plants. The systems currently generate an average wastewater flow rate of approximately 272 mgd. The three collection systems also convey the flows of 29 satellite agencies to treatment plants (City of Los Angeles 2017).

The Project Site has a sanitary sewer easement that is 60 feet wide and runs northeast to southwest from Zonal Avenue to Marengo Street. Wastewater generated on the Campus is, and would continue to be, conveyed to and treated at the Hyperion Water Reclamation Plant, located at 12000 Vista Del Mar in the Playa Del Rey district in the City of Los Angeles. The Hyperion Water Reclamation Plant is within jurisdiction of the Los Angeles RWQCB (LARWQCB 2023) and operates under Order No. R4-2023-0033 and NPDES No. CA0109991.

Sewer Flow and Capacity

The City's sewer system has sufficient capacity to handle peak dry-weather flows and has not experienced any wet-weather overflows since major relief sewers were constructed in 2006. The system has the capacity to convey wet-weather flows from 10-year storms. Most of the system components have sufficient capacity to handle larger, less frequent storms. However, overflows can occur at a limited number of locations during larger than 10-year storm events (City of Los Angeles 2017).

Wastewater Treatment

The Hyperion Water Reclamation Plant, which has a design capacity of 450 mgd and peak wet weather flow of 850 mgd. In 2020, the Hyperion Water Reclamation Plant treated an average effluent flow of approximately 215 mgd, leaving a capacity of 235 mgd (LARWQCB 2023). Approximately 60 mgd is treated at the upstream Donald C. Tillman and Los Angeles Glendale Water Reclamation Plants. All other flow in the system, and the biosolids from the upstream reclamation plants that are returned to the collection system, are treated at the Hyperion Water Reclamation Plant (City of Los Angeles 2017).

Existing Wastewater Generation

It is assumed that the existing wastewater generated by existing land uses in the Project Site is 100 percent of the indoor water demand. As shown in Table 3.17-3, the total indoor water demand is 261,692 gpd for a total sewer generation of 261,692 gpd.

STORMWATER INFRASTRUCTURE

The Project Site is located at the toe of a series of hills that shed water towards the Los Angeles River and the Project Site is in the Los Angeles River Watershed (LA County 2025). The Los Angeles River Watershed is one of the largest in the Region at 824 square miles. Approximately 324 square miles of the watershed are covered by forest or open space land including the area near the headwaters which originate in the Santa Monica, Santa Susana, and San Gabriel Mountains. The rest of the watershed is highly developed (LARWQCB 2025).

Within the Los Angeles River Watershed, the primary drainage channels are the Los Angeles River and the Rio Hondo. The Project Site is served by the County of Los Angeles Flood Control District (LACFCD). The existing stormwater management system utilizes a system of vertical roof drains, underground reinforced concrete pipe, overland sheet flow, curb, gutters, catch basins, and driveways to convey stormwater runoff to the existing public system owned and operated by LACFCD.

The LACFCD covers the 2,753-square-mile portion of the County Los Angeles south of the east-west projection of Avenue S, excluding Catalina Island. It is a special district governed by the County of Los Angeles Board of Supervisors, and its functions are carried out by the Los Angeles County Department of Public Works (LARWQCB 2015).

On the Project Site, as shown in Figure 3.17-1, *Existing Site Utilities*, the storm drain system runs north-to-south through the west campus area and most of the connections are located along Zonal Avenue and Marengo Street. These existing drains eventually join together off-site, south of the I-10 freeway, and ultimately carry stormwater to the Los Angeles River. The Campus' historical context includes a seasonal creek that ran west to east through the lower point of the Campus. The creek was located near Coroner Road on the Project Site and ran from north to south, exiting the site near the existing County of Los Angeles Medical Examiner building. The creek has been replaced by a buried stormwater pipe that now aligns with the on-site utility easement. The historic creek previously provided overland natural conveyance relief for the upper watershed.

Approximately 20 percent of the Campus slopes exceed 10 percent, with elevations within the Campus ranging from a low of approximately 320 feet in the southwestern portion of the Campus to a high of approximately 450 feet in the northeastern portion of the site. Overland flow within the Project Site are generally from the northeast to the southwest. The flow of on-site runoff is driven by the natural site topography, with the majority of runoff flowing towards the historic creek and draining into the existing storm drain that is maintained by the LACFCD. Off-site flows into or through the site are minimal.

Slopes within the three non-contiguous areas at the intersection of Mission Road and Zonal Avenue are relatively flat, with elevations of approximately 330 feet; overland flow is generally directed toward the adjacent roadways.

Additionally, the Project Site has two stormwater easements, 10 feet and 30 feet wide respectively, that run parallel to the sanitary sewer easement that runs northeast to southwest from Zonal Avenue to Marengo Street.

SOLID WASTE

Solid Waste Collection

The Project Site is in LASAN's North Central District. LASAN collects over one million tons of refuse annually from 750,000 customers, which include single-family and multi-family residences. Container and field repairs are conducted for over 750 customers per day. In addition, LASAN's container rollout program includes systematic replacement of refuse containers that have exceeded their life expectancy.

Solid Waste Disposal

An existing waste management facility on the Project Site is operated by the County and serves the General Hospital, Intern and Residents Dorm, Medical Center, and Outpatient's Building. Solid waste generated by facilities on the Campus is collected by private waste haulers for eventual disposal at one of the designated landfills in the Los Angeles area.

The waste generated by Campus facilities for disposal includes both medical and biohazardous waste. Medical and biohazardous waste needs to be disposed of in a facility that can handle these wastes.

Landfills are categorized as one of three classes:

- **Class I** landfills accept hazardous and non-hazardous wastes
- **Class II** landfills accept non---hazardous and "designated" wastes, as defined by the State Department of Resources Recycling and Recovery
- **Class III** landfills accept municipal and other non-hazardous, household waste

Existing hazardous waste at the Project Site is disposed of at designated Class I facilities.

In 2019, which is the latest year of available data, approximately 68 percent of the solid waste landfilled from the City of Los Angeles was disposed of at three landfills (CalRecycle 2019a). See Table 3.17-4, *Landfill Capacities for the City of Los Angeles,* for information on these three landfills. As shown in Table 3.17-4, the landfills have a combined residual capacity of approximately 67,669 tons per day. All the landfills have a disposal capacity beyond the 15-year horizon, as required by AB 939.

Table 3.17-4 Landfill Capacities for the City of Los Angeles

Landfill and Location	Current Remaining Capacity (Cubic Yards)	Estimated Close Date	Maximum Daily Load (tons/day)	Average Daily Disposal, (tons/day)[1]	Residual Daily Disposal Capacity (tons/day)
Simi Valley Landfill & Recycling Center	79,783,835	2063	64,750	4,872	59,878
Antelope Valley Public Landfill	12,194,026	2044	5,548	2,372	3,176
Lancaster Landfill and Recycling Center	13,017,160	2044	5,100	485	4,615
				Total	**67,669**

Source: CalRecycle 2025a, CalRecycle 2025b, CalRecycle 2025c, CalRecycle 2024.

Note:

1. Average daily disposal is calculated from annual disposal based on 300 operating days per year; each of the three landfills is open six days per week, Monday through Saturday, except for certain holidays.

In the County of Los Angeles, approximately 60 percent of the solid waste landfilled from the County of Los Angeles was disposed of at four landfills: Calabasas Landfill, Chiquita Canyon Sanitary Landfill, El Sobrante Landfill, and Sunshine Canyon City/County Landfill (CalRecycle 2019b). As shown in Table 3.17-5, *Landfill Capacities for County of Los Angeles* the landfills have a combined residual capacity of approximately 17,468 tons per day. Two (Chiquita Canyon Sanitary Landfill and El Sobrante Landfill) of the four landfills have a disposal capacity beyond the 15-year horizon, as required by AB 939.

Table 3.17-5 Landfill Capacities for County of Los Angeles

Landfill and Location	Current Remaining Capacity (Cubic Yards)	Estimated Close Date	Maximum Daily Load (tons/day)	Average Daily Disposal, (tons/day)[1]	Residual Daily Disposal Capacity (tons/day)
Calabasas Landfill	6,700,000	2029	3,500	756	2,744
Chiquita Canyon Sanitary Landfill	58,259,767	2047	12,000	6,181	5,819
El Sobrante Landfill	121,083,583	2051	16,054	10,858	5,196
Sunshine Canyon City/County Landfill	66,200,000	2037	12,100	8,390	3,710
				Total	**17,468**

Source: CalRecycle 2025e, CalRecycle 2025f, CalRecycle 2025g, CalRecycle 2025h, CalRecycle 2024.

Note:

1. Average daily disposal is calculated from annual disposal based on 300 operating days per year; each of the three landfills is open six days per week, Monday through Saturday, except for certain holidays.

Solid Waste Diversion and Recycling

Compliance with AB 939 is measured by comparing the CalRecycle target disposal rates for residents and employees to actual disposal rates. The CalRecycle target calculated disposal rates for unincorporated Los Angeles are 7.4 pounds per person per day (ppd) for residents and 41.5 ppd for employees. The actual disposal rates in 2023 were 5.3 ppd for residents and 23.6 ppd for employees (CalRecycle 2023a). Therefore, the solid waste diversion goals for Unincorporated Los Angeles have been met.

The CalRecycle target calculated disposal rates for Los Angeles Area Integrated Waste Management Authority are 7.1 pounds ppd for residents and 17.5 ppd for employees. The actual disposal rates in 2023 were 6.6 ppd for residents and 14.10 ppd for employees (CalRecycle 2023b). Therefore, the solid waste diversion goals for the Los Angeles Area Integrated Waste Management Authority have been met.

Existing Solid Waste Generation

The existing land uses in the Project Site consist of various medical and hospital uses, a childcare center, dormitories, office uses, storage, warehouses, and utilities all of which generate solid waste. Table 3.17-6, *Existing Solid Waste Generation*, shows the solid waste generated by the existing uses within the Project Site.

Table 3.17-6 Existing Solid Waste Generation

Land Use Type	Unit	Conversion Rate	Solid Waste Generation Rate	Solid Waste Generation (ppd)
Educational	148,100 sf	-	0.007 lb/student	1,039
Hospital	141,900 sf	0.011 bed/sf[1]	16	33126
Housing	67,500	160 beds[2]	16	2560
Office	109,400 sf	-	0.006	1,843
Storage	4,000 sf	-	0.0142	99
Utilities	17,300 sf	-	0.014	642
Warehouse	228,000 sf	-	0.0142	1,167
Total	**2,540,236**	**-**	**-**	**40,476**

Source: CalRecycle 2025d.

Notes: square foot = sf; lb = pounds; ppd = pounds per day

1. A proportional rate was used based on the WSA. The WSA considered 450 beds per 400,000 sf of hospital building space.

2. Number of beds anticipated for the Restorative Care Village.

OTHER UTILITIES

Electricity

LADWP provides electricity to the Project Site. LADWP is the nation's largest municipal power utility with a net maximum plant capacity of 10,730 megawatts (MW) and net dependable capacity of 8,007 MW (LADWP 2025b). Total electricity consumption in LADWP's service area was projected to be 28,696 gigawatt-hour (GWH) per year in 2035; one GWH is one million kilowatt hours. In 2025, the projected total electricity consumption in LADWP's service area is 24,576 GWH (CEC 2022).

As shown in Table 3.5-5, Building Energy Consumption: Existing Uses, the electricity demand of the buildings associated with existing uses within the Project Site is 103,374,261 Kilowatt-hour (KWh) per year.

Natural Gas

SoCalGas provides natural gas to the Project Site. SoCalGas is the nation's largest natural gas distribution utility and serves 21.1 million consumers through 5.9 million meters in more than 500 communities (SoCalGas 2025). Total natural gas consumption in SoCal Gas's service area was projected to be 7,672 million Therms (MM Therms) per year in 2035 (CEC 2022b).

As shown in Table 3.5-5, Building Energy Consumption: Existing Uses, the natural gas demand of the buildings associated with existing uses within the Project Site is 120,497 million British thermal units (MMBTU) annually.

Steam Plant

Across the Project Site, the existing utility facilities are aging, including the steam plant that is on the Project Site. The sitewide utilities originate from the West Central Plant, but the West Central Plant is operating with significant capacity loss and unsafe infrastructure. The West Central Plant, originally constructed in the 1960s with partial refurbishments in 2013, exemplifies these challenges. Designed to provide central heating and chilled water to several buildings both on- and off-site, the West Central Plant is now struggling to meet the demands of the current infrastructure, let alone the additional load anticipated with future development projects. While these systems have an estimated 10 to 13 years of remaining life, they are ill-equipped to handle the increased cooling demands that will arise as new buildings and programs are added to the campus.

The existing steam infrastructure on site originates from the West Central Plant. From here steam pipes route through the site to the County Medical Examiner and Pharmacy buildings located to the west, north to the Central Juvenile Hall (located just north of Zonal Avenue) and east to serve the General Hospital Building and Medical Center. Leaks have been reported at several sections of the steam system.

Despite fan replacements in 2013, these towers are in fair condition and require regular maintenance. Additionally, the make-up water connections are in poor condition, further compromising system reliability. If the West Central Plant is relocated or expanded, these towers would need replacement to accommodate updated chillers and meet future capacity requirements.

Telecommunications

A number of franchised telecommunications providers serve the region. Some internet providers in the region include AT&T, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon (City of Los Angeles 2025). Telecom and low voltage services are provided to the Project Site through several points of connections in Marengo Street, Zonal Avenue, and Mission surrounding the Project Site.

3.17.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XIX, states that the Proposed Project would result in a significant impact related to utilities and service systems if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

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

c) Result in a determination by the wastewater treatment provider that 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.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

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

METHODOLOGY

The analysis of utilities and service systems impacts in this section is based on a desktop review of utilities and services on and near the Project Site and identifying utilities and services that might be affected by the construction and operation of the facilities that would be developed under the Proposed Project. Information was compiled from regional/local maps, planning documents, the Proposed Project-specific WSA, and online resources. The WSA estimated the indoor water use for the Proposed using sewer generation factors published by LASAN in 2012. The outdoor landscape water demand was estimated using the California Code of Regulations Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. The estimated total

outdoor water use is assumed to be the Maximum Applied Water Allowance (MAWA)[1] for a conservative estimate.

The analysis in this Draft SEIR focuses on whether new or expanded public facilities would be required to maintain service, or whether new facilities or expanded facilities would result in environmental impacts.

This analysis also evaluates the Proposed Project's potential environmental impacts resulting from construction and operation of the Proposed Project.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT ANALYSIS

As a Subsequent EIR, this Draft SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future project and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project contained in Section 3.17.4, *Project Impact Analysis*, and 3.17.5, *Cumulative Impact Analysis*.

The 2014 Master Plan EIR concluded that the 2014 Master Plan would result in significant utilities and service system impacts with implementation of mitigation measures related to adequate water supplies and adequate local city sewer line capacity. Table 3.17-7, *Summary of the 2014 Master Plan EIR Utilities and Service Systems Impact Conclusions,* provides an overview of previous utilities and service systems impact analyses for the Campus.

[1] The Maximum Applied Water Allowance reflects the upper limit of annual applied water for landscaped area allowed by the Model Water Efficient Landscape Ordinance.

Table 3.17-7 Summary of the 2014 Master Plan EIR Utilities and Service Systems Impact Conclusions

Significance Criteria 1	Significance before Mitigation	Mitigation Measure 2	Significance after Mitigation
ULT-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
ULT-2: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
UTL-3: Require or result in the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
UTL-4: Not have sufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.	Less Than Significant (construction) Potentially Significant (operation)	MM-USS-1	Significant and Unavoidable (operation) Significant if it is determined that water supplies will not be sufficient to meet future (i.e., 2035 and beyond) master plan projects' water demands.
UTL-5: Result in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected	Less Than Significant (construction) Potentially Significant (operation)	MM-USS-2	Significant and Unavoidable (operation) Since the County cannot compel another public entity, in this case BOS, to conduct further gauging and evaluation, for the purposes of this EIR, the

Table 3.17-7 Summary of the 2014 Master Plan EIR Utilities and Service Systems Impact Conclusions

Significance Criteria 1	Significance before Mitigation	Mitigation Measure 2	Significance after Mitigation
demand in addition to the provider's existing commitments.			impacts on local sewer lines are considered to be significant and unavoidable.
UTL-6: Be served by a landfill that does not have sufficient permitted capacity to accommodate the project's solid waste disposal needs.	Less Than Significant (construction and operation)	None	Less Than Significant (construction and operation)
UTL-7: Not comply with federal, state, and local statutes and regulations related to solid waste.	Less Than Significant (construction and operation)	None	Less Than significant (construction and operation)
UTL-8: Result in a substantial increase in energy demand that would affect local or regional energy supplies and require additional capacity to meet the increased demand**.**	Less Than Significant (construction) Potentially Significant (operation of natural gas)	None	Significant and Unavoidable (operation)

Source: County of Los Angeles 2014.

Notes:

1. Significance criteria in this table are those used in the 2014 Master Plan EIR. The analysis in this Draft SEIR uses current significance criteria, which in some cases differ from those used in the 2014 Master Plan EIR.

2. See Appendix B, Comparison of Adopted 2014 Master Plan EIR Mitigation Measures and Proposed 2026 SEIR Mitigation Measures, for a complete list of mitigation measures presented in the 2014 Master Plan EIR.

3.17.4 Project Impact Analysis

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Construction

Construction activities associated with the installation of potable water lines, sewer lines, a stormwater system, electrical lines, natural gas, and steam during future phases of construction would primarily involve grading and trenching to replace and install new water lines, sewer lines, storm drain infrastructure, electrical lines, and natural gas lines as needed. While the majority of this work would occur within the Project Site, some connections/improvements may also occur in the adjacent public rights-of-way. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft SEIR because construction is a component of the Proposed Project.

Water

For water supplies, the analysis focuses on whether LADWP would have sufficient water supply to accommodate the demand generated by the construction phases of the Proposed Project. Construction workers would primarily rely on imported water from water trucks managed by contractors (for consumption and construction uses, such as dust control), which would use imported sources and while it would be provided by LADWP, it would be minimal. Water usage during the construction of the Proposed Project would be nominal when compared to daily operational water usage on the site. Any increases in LADWP-provided water consumption would be minimal during the construction of individual projects under the Proposed Project and would not exceed current demand. Thus, construction of the Proposed Project would not require new or expanded water infrastructure, the construction or relocation of which could cause significant environmental effects, and impacts would be considered **less than significant**.

Wastewater

For wastewater, the analysis focuses on whether LASAN would need to expand its off-site sewer facilities to accommodate the demand generated by the construction phases of the Proposed Project. Any increase in wastewater generation would be minimal during the construction phases of the Proposed Project and would not exceed current generated volumes. Construction workers would primarily utilize portable restrooms managed by contractors, which would dispose of wastewater off-site and would not contribute to wastewater flows to the City's wastewater system. Thus, construction of the Proposed Project would not require new or expanded wastewater infrastructure, the construction or relocation of which could cause significant environmental effects, and impacts would be considered **less than significant**.

Stormwater Infrastructure

For stormwater infrastructure, the analysis focuses on whether LACFCD would need to expand its stormwater system to accommodate the demand generated by the project. During construction of individual phases that exceed one acre, an SWPPP and erosion plan would be required, prepared, and implemented to limit the amount of stormwater runoff entering storm

drains during the construction phases of the Proposed Project. During construction phases, construction BMPs would be implemented to reduce the amount of stormwater diverted to City stormwater drains. Thus, construction of the Proposed Project would not require new or expanded wastewater infrastructure, the construction or relocation of which could cause significant environmental effects. Impacts would be **less than significant**.

Other Utilities

Electricity

For electricity, the analysis focuses on whether LADWP would need to expand its existing off-site electrical lines to accommodate the construction electricity demand generated by the Proposed Project. Construction of the Proposed Project would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. Most construction equipment during demolition and grading would be gasoline or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and finishing. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Therefore, construction of the Proposed Project would not require new or expanded electricity infrastructure, the construction or relocation of which could cause significant environmental effects. Impacts would be **less than significant**.

Natural Gas

For natural gas, the analysis focuses on whether LADWP would need to expand its existing off-site electrical lines to accommodate the construction demand generated by the Proposed Project. It is not anticipated that construction equipment used for the Proposed Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, construction of the Proposed Project would not require new or expanded natural gas infrastructure, the construction or relocation of which could cause significant environmental effects. Impacts would be **less than significant**.

Steam Plant

For steam lines, the analysis focuses on whether the existing steam plant would need to expand its existing steam lines to accommodate the demand generated by the project. There would be no demand for steam during the construction phase, therefore impacts would be **less than significant**.

Telecommunications

For telecommunications, the analysis focuses on whether telecommunications services would need to expand its existing off-site electrical lines to accommodate the demand generated by the project. Infrastructure supporting telecommunications services would be installed on-site during Project phases. Wireless telecommunications facilities would be installed pursuant to the requirements of the County of Los Angeles Code of Ordinances. Installation of telecommunication infrastructure could result in physical impacts to the surface and subsurface of the Project Site. These impacts are part of the Proposed Project's construction phase and are evaluated throughout this Draft SEIR. Therefore, impacts would be **less than significant**.

Operation

Water

The water system for future development within the Project Site would be designed to provide on-site water demands from the existing public water collection system owned by LADWP. The water infrastructure in the vicinity of the Proposed Project includes LADWP water delivery mainlines in the surrounding streets (Marengo Street, Zonal Avenue, Mission Road).

The estimated water demand from the Proposed Project is conservatively estimated to be 814 AFY. The water demand for existing uses is estimated to be 301 AFY, for a net increase of 513 AFY. The estimate for the Proposed Project does not include the voluntary water conservation measures that may be incorporated into the Proposed Project such as:

- Water-efficient fixture options and conservation methods that may offer improved performance beyond baseline code requirements.
- Water-efficient landscape and irrigation strategies, and green infrastructure strategies where applicable.
- Water-efficient measures for pools and water features, including the use of metering and leak-detection systems, splash troughs, and potential reuse of backwash water for irrigation.

These water conservation measures would utilize less water than the minimum set forth by applicable codes and if implemented would decrease the water demand for the Proposed Project. Additionally, the Proposed Project's estimated irrigation water demand is the MAWA which corresponds to the upper limit of annual applied water allowed by the Model Water Efficient Landscape Ordinance (see Appendix H).

The Proposed Project would require local-serving water infrastructure to be appropriately sized and installed within the Project Site. Prior to the issuance of building permits, LADWP would review proposed building plans for conformity with State and local statutes and ordinances. Additionally, LADWP would use connection fees and agreements to maintain and expand its

water collection system as necessary and ensure that new developments pay their fair-share costs associated with increased demand.

Future development within the Project Site would meet requirements set forth in CalGreen regarding water efficiency and conservation. CALGreen established green building standards for nonresidential structures that include new buildings, additions, or alterations. Water conservation measures would help to ensure that the Proposed Project does not require additional water demands beyond those typical of similar projects in the City. Therefore, the Proposed Project would not result in the relocation or construction of new or expanded water facilities and impacts would be less than significant. Therefore, impacts with respect to water infrastructure would be **less than significant**.

Wastewater

Once operational, the sewer system would be designed to convey on-site sewage flows within the Project Site to the existing public sewer collection system owned by LASAN, which ultimately discharges into the Hyperion Water Reclamation Plant. The sewer infrastructure in the vicinity of the Proposed Project includes four discharge routes. All wastewater generated on the Campus would ultimately be conveyed to the Hyperion Water Reclamation Plant.

The estimated sewer flows generated from full operation of the Proposed Project are estimated to be 100 percent of indoor water use for a total of 708,837 gpd (794 AFY) (see Appendix H).) The sewer generation for existing uses is estimated to be 261,692 gpd, for a net increase of 447,145 gpd.

The Proposed Project would require local-serving sewer infrastructure to be appropriately sized and installed within the Project Site. Prior to the issuance of building permits, LASAN would review proposed building plans for conformity with State and local statutes and ordinances. Additionally, LASAN's Sewer Service Charge generates funds for constructing and maintaining wastewater facilities such as sewers and sewage treatment plants, and for treating the sewage that is discharged into the sewer system. The Sewer Service Charge applies to all residential and commercial customers. LASAN uses these charges to maintain and expand its sewer system as necessary and ensure that new developments pay their fair-share costs associated with increased demand. Therefore, impacts with respect to stormwater infrastructure would be **less than significant**.

Stormwater Infrastructure

Pursuant to the County of Los Angeles Department of Public Works' hydrology manual, when development phases under the Proposed Project alter the drainage pattern of the Project Site, the development phases would be required to have site-specific hydrology and hydraulic studies to determine the capacity of the existing storm drain systems and Project impacts on such

systems prior to approval by the Los Angeles County Department of Public Works. The Proposed Project would be required to comply with site-specific "allowable discharge rates," as identified by the County of Los Angeles Department of Public Works, that limit post-project peak flow discharges compared to existing conditions, thus minimizing the potential for flooding on- or off-site and exceedance of the capacity of existing or planned stormwater drainage systems. Therefore, impacts with respect to stormwater infrastructure would be **less than significant**.

Other Utilities

Electricity

Electrical service to the Proposed Project would be provided by LADWP through connections to existing off-site electrical lines and new on-site infrastructure to be developed during Proposed Project phases. However, should the proposed on-site Central Utility Plant, described in Chapter 2, *Project Description*, be constructed and operational in future years, the Central Utility Plant would reduce the amount of electricity drawn from LADWP's supply on the region's electrical grid. Because the Central Utility Plant would alleviate electrical demand on the grid resulting from the Proposed Project, this assessment conservatively assumes no Central Utility Plant is constructed, and assumes electrical demand generated by the Proposed Project would be supplied by LADWP via regional distribution infrastructure.

As shown in Table 3.5-8, *Mixed-Fuel Project Electricity Consumption*, in Chapter 3.5, *Energy*, of this Draft EIR, the total electricity use on the Project Site at full buildout of the proposed land uses would be up to 164,154,805 kWh per year for a net change of 60,780,544 kWh per year when compared to existing land uses. The energy consumption increase is modest when considered in the context of LADWP's service area, as LADWP's planning area is forecasted to experience an estimated 28,696 GWh of annual electricity demand in 2035 (CEC 2022). The forecasted electricity usage for the Proposed Project would be less than 0.3 percent of LADWP's projected electricity supply. As such, without the Central Utility Plant and assuming the Proposed project would be all electric, the Proposed Project's electrical demand on LADWP's supply would not result in the need for new or expanded generation facilities beyond what LADWP is already planning for its service area. Moreover, as described in Chapter 3.6, *Energy*, the Proposed Project would be required to engage with LADWP through its interconnection queue process to identify supply infrastructure needs, identify cost-sharing agreements for any needed improvements, and conduct further review as necessary.

Finally, as described in Chapter 2, *Project Description*, a new centralized energy distribution system (utility plant) may be implemented, and it could provide a dedicated electrical service on the Project Site to serve the Proposed Project. The exact location and generation capacity of the utility plant is currently unknown; however, the utility plant is proposed to include solar photovoltaic arrays, battery storage, and a Campus-wide piping loop to enable thermal energy sharing in a system in which most, if not all, buildings on the Project Site would be physically

connected. With the utility plant, the Proposed Project's electrical demand on the grid would be reduced below what is identified above and would not result in the need for new or expanded LADWP facilities. As such, this impact would be **less than significant** with respect to electrical utility services.

Natural Gas

As shown in Table 3.5-10, *Mixed-Fuel Project Natural Gas Consumption,* natural gas use associated with full buildout of land uses included in the Proposed Project would be up to 144,972 MMBTU annually for a net change of 24,475 MMBTU annually when compared to existing land uses. Natural gas usage is estimated to remain relatively constant between 2020 and 2035, increasing by approximately 736 MM Therms per year (CEC 2022b). All new development under by the Proposed Project would be required to demonstrate compliance with the current California Building Standards Code and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption on a per dwelling unit and per square foot basis when compared to existing development. New and replacement buildings in compliance with these standards would generally have greater natural gas efficiency than existing buildings. As such, this impact would be **less than significant**.

Steam Plant

As described in Section 3.17.2, *Existing Conditions*, there is a steam plant on the Project Site that originates from the West Central Plant. As part of the Proposed Project, the West Central Plant would be decommissioned and a new energy system would be installed. The new energy system would be designed to meet current and future energy demands and would directly support initiatives like LA's Green New Deal targeting a zero-carbon grid and zero-carbon buildings by mid-century. By integrating advanced district thermal energy systems, including heat recovery chillers, thermal energy storage, and potentially geo-exchange loops, the Project Site would achieve efficiency in energy use, balancing heating and cooling demands while recovering and reusing energy that would otherwise be wasted.

For the Central Utility Plant, the environmental impacts are discussed throughout the Draft SEIR since the Central Utility Plant requires on-site construction, is a part of the Proposed Project, and has a footprint within the Project Site. Therefore, impacts would be **less than significant**.

Telecommunications

As described in Section 3.17.2, *Existing Conditions*, there are multiple franchised telecommunications providers that serve the region. The Project Site is currently served by telecommunication infrastructure, and increased service connections as part of the Proposed Project would be done incrementality. Therefore, due to the variety and availability of telecommunications providers, no significant expansion or construction of the telecommunications network is anticipated. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

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

Construction

Any increases in LADWP-provided water consumption would be minimal during the construction of individual projects under the Proposed Project and would not exceed current demand as construction workers would primarily rely on imported water from water trucks managed by contractors (for consumption and construction uses, such as dust control), which would use imported sources. Water usage during the construction of the Proposed Project would be nominal when compared to daily operational water usage on the site. Thus, impacts to water supplies during construction would be considered **less than significant**.

Operation

Assuming full buildout of the land uses included in the Proposed Project, it would result in a total water demand of up to approximately 814 AFY. The water demand projection in LADWP's 2020 UWMP was developed based on the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) demographic projection by the Southern California Association of Governments (SCAG) for the LADWP's service area. The demographic projection was provided to LADWP from the Metropolitan Water District of Southern California, who collaborates with SCAG to aggregate demographic data for each of its 26 member agencies. LADWP's 2020 UWMP identified water supplies to meet projected water demands through 2045.

As shown in Appendix H and Chapter 3.12, *Population and Housing*, the Proposed Project is consistent with the demographic projections for the City from the 2020 RTP/SCS. Since LADWP's 2020 UWMP water demand projection is based off the 2020 RTP/SCS demographic projections, and the Proposed Project is consistent with the demographic projections from the 2020 RTP/SCS, the Proposed Project's anticipated water demand is accounted for within the projected water supplies in LADWP's 2020 UWMP for normal, single-dry, and multiple-dry years through the year 2045.

Indoor water fixtures for all future development under the Proposed Project would comply with County of Los Angeles Code of Ordinance requirements related to reducing indoor water consumption. The County of Los Angeles Plumbing Code (Title 28 of the County of Los Angeles Code of Ordinances) references the California Plumbing Code, which establishes maximum flow rates for indoor water fixtures. The Proposed Project would also comply with the requirements of Title 20, Section 20.09.010, Maintaining Existing Water-Efficient Landscapes, of the County's

Code of Ordinances and the requirements of CalGreen. These requirements would limit potential increases in water usage at the Project Site. Additionally, the estimated water demand for the Proposed Project is conservatively estimated to be 814 AFY. This estimate does not include the voluntary water conservation measures that may be incorporated into the Proposed Project and is based on the MAWA for irrigation water demand (see Appendix H).

However, the Proposed Project assumes a phased long-term 25-year development horizon. The current 2020 UWMP projects water supplies based on population projections through 2045. The next UWMP will project water supplies through 2050. As such, it is not known whether sufficient water supplies and entitlements would exist to accommodate those projects' water demand. Therefore, water supply impacts for projects constructed after 2045 could be potentially **significant**.

Impact USS-1: Operation of the Proposed Project could have a water demand that exceeds the capacity of water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

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

Significance with Mitigation: Significant and unavoidable. Implementation of Mitigation Measure USS-1 would require the County to assess the availability of water supplies to accommodate future development with the Project Site that would be implemented beyond the year 2045. However, if it is determined that water supplies would not be sufficient to meet future water demands then this impact would remain **significant and unavoidable**.

c) Would the project result in a determination by the wastewater treatment provider that 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?

Construction and Operation

The Proposed Project would result in average sewer flows of up to 708,837 gpd (see Appendix H), based on full buildout of land uses resulting from the Proposed Project. As described in Section 3.17.2, *Existing Conditions*, the Hyperion Water Reclamation Plant is currently operating with a residual capacity of approximately 215 mgd. Therefore, the Hyperion Water Reclamation Plant currently has adequate capacity to serve the Proposed Project's projected sewer generation in addition to the provider's existing commitments.

Based on the estimated flows, the sewer conveyance system would be appropriately sized to accommodate the total flow for the Proposed Project; however, further detail gauging and evaluation may be needed as part of the permit process for individual projects to identify suitable sewer connection points and ensure adequate line capacity. A final approval for sewer capacity and connection permit shall be made at that time. If there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered to be significant. Therefore, impacts would be potentially **significant**.

Impact USS-2: Operation of the Proposed Project could generate wastewater that exceeds the capacity at existing wastewater facilities.

> **Mitigation Measure USS-2:** Prior to issuance of a building permit for any future development under the Proposed Project that could result in an increase in wastewater generation, the Project Applicant(s) shall coordinate with the City of Los Angeles Bureau of Sanitation to conduct further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. If the public sewer has insufficient capacity, then the County shall be required to build a sewer line to a point in the sewer system with sufficient capacity.

Significance with Mitigation: Significant and unavoidable. Although the Proposed Project would implement Mitigation Measure USS-2 to reduce Project-related impacts, uncertainty regarding existing sewer system capacity and the extent, timing, and funding of future local utility infrastructure remains. Because the location, scale, and timing of potential conveyance improvements have not been identified and the environmental impacts of such improvements cannot be determined with the information currently available, it cannot be concluded that wastewater impacts would be reduced to a less-than-significant level. Therefore, the Proposed Project's impact on the capacity of existing wastewater facilities would remain **significant and unavoidable**.

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Construction

The Proposed Project would include the demolition of existing buildings, pavement, utilities, and landscaping. Table 2-3, *Buildings and Features to Be Demolished*, lists the buildings proposed for demolition, and Figure 2-6, *Buildings and Features to Be Demolished*, identifies the locations of the structures proposed for demolition. Given that the demolition debris and solid waste generated by construction activities would be finite and limited to construction periods, existing landfills would have sufficient long-term permitted capacity to accommodate construction generated solid waste. Pursuant to the County of Los Angeles Code of Ordinances Chapter 20.87, the Proposed Project would need to divert a minimum of 50 percent of all generated tonnage for recycling and reuse. In addition, CALGreen requires a minimum of 65 percent of the nonhazardous construction and demolition waste to be recycled and/or salvaged. Accordingly, the Proposed Project would be required to comply with the more stringent applicable diversion requirements.

Therefore, construction of the Proposed Project would not generate solid waste in excess of State or local standards and would not exceed the capacity of existing landfills or other local infrastructure and construction impacts would be **less than significant**.

Operation

LASAN provides solid waste collection services to the Project Site. Under existing conditions, solid waste generated at the Campus is collected by LASAN. All waste and recycling materials would be compacted and emptied on a weekly basis for pickup by LASAN. As shown in Table 3.17-8, *Estimated Solid Waste Generation*, at full buildout, the Proposed Project would generate up to approximately 48,674 ppd for a net increase of 8,198 ppd (which equals approximately 4.1 tons per day[2]).

[2] 1 ton equals 2,000 pounds.

Table 3.17-8 Estimated Solid Waste Generation

Land Use	Buildout	Solid Waste Generation Rate	Solid Waste Generation (PPD)
Residential	3,200 du	4lb/dwelling unit	12,800
General Office	400,000 sf	6 lb/1,000 sq ft /day	2,400
Medical Office	735,300 sf	6 lb/1,000 sq ft /day[1]	4,412
Retail	320,000 sf	4.6 lb/100 sq ft/day	14,720
Hospitality	200 units	4 lb/room/day	800
Community Benefits	350,000 sf	6 lb/1,000 sq ft /day[1]	2,100
Education	110,000 sf	0.007 lb/sq ft/day	770
Warehouse	160,000 sf	1.42 lb/100 sq ft/day	2,272
Clean Tech/Light Industrial	200,000 sf	0.006 lb/sq ft/day	1,200
Hospital	450 beds	16 lb/bed/day	7,200
Total			**48,674**

Source: CalRecycle 2025d.

Note: du = dwelling units; sf = square feet

1. Same generation rate as general office.

As shown in Table 3.17-4, *Landfill Capacities for the City of Los Angeles*, the Simi Valley Landfill & Recycling Center has a residual daily disposal capacity of 59,878 tons per day. The Antelope Valley Public Landfill has a residual daily disposal capacity of 3,176 tons per day. The Lancaster Landfill and Recycling Center has a residual daily disposal capacity of 4,615 tons per day. This equates to an overall total residual capacity of approximately 67,669 tons per day for all three landfills.[3] Conservatively assuming that all the Proposed Project's waste is landfilled, this would be less than one percent of the residual capacities for the Simi Valley Landfill & Recycling Center, the Antelope Valley Public Landfill, and the Lancaster Landfill and Recycling Center. Therefore, there is sufficient capacity at the landfills for solid waste generated by the Proposed Project.

New and renovated medical/research facilities that would be developed under the Proposed Project could result in increases in biomedical or other hazardous wastes. All hazardous waste, including biomedical waste, would be transported, used, and disposed of at designated Class I

[3] Simi Valley Landfill & Recycling Center (59,878 tons per day) + Antelope Valley Public Landfill (3,176 tons per day) + Lancaster Landfill and Recycling Center (4,615 tons per day) = 67,669 tons per day

landfills in accordance with applicable local and regional regulations. These activities already take place on the Project Site, and facilities for the proper handling of these materials are already present on the site.

In summary, operation of the Proposed Project would not generate solid waste in excess of State or local standards and would not exceed the capacity of existing landfills or other local infrastructure. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Construction and Operation

All future development pursuant to the Proposed Project would comply with Division 4.4 of the CALGreen Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Future development would also comply with AB 341, which mandates recycling for commercial and multifamily residential land uses. Additionally, future businesses that generate organic waste in amounts over a certain threshold would be mandated to recycle organic matter in accordance with AB 1826. Per the County of Los Angeles Code of Ordinances Chapter 20.87, the Proposed Project would also need to divert 50 percent of all generated tonnage for recycling and reuse. Future development would also comply with the following federal, State, and local laws and regulations that govern solid waste disposal:

- The Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) which requires diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requiring local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

As shown in impact discussion (d), the Proposed Project's solid waste is adequately accommodated by landfills serving the Project Site. Therefore, the County and landfills that would serve the Project Site would comply with all applicable federal, State, and local solid waste regulations, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.17.5 Cumulative Impact Analysis

The study area for potential cumulative utilities and service systems impacts consists of the respective service areas of the utility providers serving the Project Site. A one-mile radius was not chosen for analysis of cumulative impacts because utilities and service system operate at a regional scale that extends beyond the immediate vicinity of the Project Site.

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable future project within the applicable service areas would result in a substantial increase in demand for water supply, wastewater conveyance and treatment, stormwater infrastructure, solid waste disposal capacity, or other utility services such that existing or planned facilities would require construction of new or expanded infrastructure that could result in significant environmental effects. The cumulative projects listed in Table 3-2, *List of Cumulative Projects*, are all within the service area of LADWP, LASAN, LACFCD, and SoCalGas. The cumulative projects would also be served by the landfills listed in Table 3.17-4 or 3.17-5.

Would the project have a cumulative effect related to utilities and service systems?

Water

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects within the water service area, would substantially increase water demand such that existing distribution or treatment facilities require expansion or construction of new infrastructure that could result in significant environmental impacts. Cumulative impacts would also occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects within the water service area, would result in a determination by the water treatment provider that it does not have sufficient water supplies to serve the project's projected and cumulative project demands in addition to the provider's existing commitments during normal, dry, and multiple dry years. The cumulative analysis considers water supply and distribution within the LADWP's service area.

Construction

Construction activities associated with the Proposed Project would generate minimal water consumption and would not exceed current demand due to the associated decommissioning of existing buildings/structures. Construction workers would primarily rely on imported water from water trucks managed by contractors (for consumption and construction uses, such as dust control). Similarly, construction activities associated with cumulative development in the surrounding area would also generate minor temporary water demand with construction workers primarily relying on imported water from water trucks. Therefore, the Proposed Project's contribution to cumulative water demand during construction would not be

cumulatively considerable, and cumulative construction-related water impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative growth in LAPDW's service area, including increases in residential, commercial, institutional, and public facility uses, would collectively result in increases in water demand. LAPDW would review cumulative projects for adequacy of water supply, and LAPDW updates the UWMP every five years to ensure that there are adequate water supplies and contingency plans for future residents and customers. The UWMP is based on anticipated growth projections for and therefore captures cumulative growth. Cumulative development would require the implementation of water-efficiency and water conservation measures, as required by CALGreen and the MWELO irrigation requirements. All cumulative projects within the City would also comply with the requirements of Chapter IX, Article 4, *Plumbing Code*, and Chapter XII, Article V, *Water Efficient Requirements for new Development and Renovation of Existing Buildings*. These requirements would limit potential increases in water usage.

Additionally, under the provisions of SB 610, LAPDW is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that meets certain thresholds. The types of projects that are subject to the requirements of SB 610 tend to be larger projects that may or may not have been included in the growth projections of the LAPDW's 2020 UWMP. The water supply assessment for such projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

However, as discussed in impact (c), for future development that may be proposed far in the future (i.e. beyond 2045), it is not known whether sufficient water supplies and entitlements would exist to accommodate those projects' water demand. LAPDW's 2020 UWMP only projects water supplies to the year 2045. Therefore, water supply impacts for projects constructed after 2045 could be potentially **significant**.

Impact USS-3: Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects within the LAPDW's service area, could have a water demand that exceeds the capacity of water supplies.

Mitigation: Implement Mitigation Measure USS-1.

Significance without Mitigation: Significant and Unavoidable. Implementation of Mitigation Measure USS-1 would assess the availability of water supplies to accommodate future development that would be implemented beyond the year 2045. However, if it is determined

that water supplies would not be sufficient to meet future water demands then this impact would remain **significant and unavoidable**.

Wastewater

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects within the wastewater service area, would substantially increase wastewater generation such that existing conveyance or treatment facilities would require expansion or construction of new infrastructure that could result in significant environmental impacts. Cumulative impacts would also occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects within the wastewater service area, would result in a determination by the wastewater provider that it does not have adequate capacity to serve the project's projected and cumulative project demands in addition to the provider's existing commitments. The cumulative analysis considers wastewater collection and treatment within the LASAN's service area.

Construction

Construction activities associated with the Proposed Project would generate limited wastewater flows from worker-related sanitary uses. Similar construction activities associated with cumulative development in the surrounding area would also generate minor temporary wastewater flows. Therefore, the Proposed Project's contribution to cumulative wastewater generation during construction would not be cumulatively considerable, and cumulative construction-related wastewater impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

This section analyzes potential cumulative impacts related to wastewater that could occur from implementation of the Proposed Project in combination with other reasonably foreseeable projects in the surrounding area. The cumulative analysis considers wastewater treatment within the Hyperion Water Reclamation Plant's service area and wastewater conveyance within LASAN's service area.

Cumulative growth in the City and County, including increases in residential, commercial, institutional, and public facility uses, would collectively result in increases in wastewater generation and flow. Currently, there is 215 mgd of available residual capacity at the Hyperion Water Reclamation Plant. However, where the utility providers have identified specific individual projects that are required to meet future projected regional cumulative demands and determined that construction or operation of those projects would result in significant impacts to the environment, then the cumulative impact of the Proposed Project and other projects in the services areas would be considered significant under CEQA.

As discussed in impact discussion (c), wastewater impacts are considered significant due to the sewer system capacity being unknown and the extent, timing, and funding of future local sewer infrastructure improvements have not been identified. Therefore, the significance of potential cumulative impacts on local sewer infrastructure cannot be definitively determined. Similar uncertainties apply at the cumulative level. Although the Hyperion Water Reclamation Plant has residual treatment capacity at this time, cumulative development would rely on downstream conveyance facilities that may not currently have sufficient capacity to support long-term cumulative growth.

The specific improvements that would be required to address future capacity constraints, such as pipe upsizing, new sewer segments, or regional conveyance system upgrades, have not been defined by LASAN or other responsible agencies. Because the location, scale, and timing of necessary wastewater conveyance improvements are unknown, and because the environmental impacts of these potential improvements cannot be determined with the information currently available, it is not possible to conclude that cumulative wastewater impacts can be mitigated to a less-than-significant level. The uncertainty surrounding system capacity and the lack of identified feasible mitigation to ensure adequate cumulative conveyance capacity result in a determination that cumulative wastewater impacts would be potentially **significant**.

Impact USS-4: Operation of the Proposed Project, together with other past, present, and reasonably foreseeable projects within the wastewater service area, could generate wastewater that exceeds the capacity at existing wastewater treatment facilities.

Mitigation: Implement Mitigation Measure USS-2.

Significance with Mitigation: Significant and unavoidable. Although the Proposed Project would implement Mitigation Measure USS-2 to reduce Project-related impacts, uncertainty regarding existing sewer system capacity and the extent, timing, and funding of future local utility infrastructure remains. Because the location, scale, and timing of potential conveyance improvements have not been identified and the environmental impacts of such improvements cannot be determined with the information currently available, it cannot be concluded that cumulative wastewater impacts would be reduced to a less-than-significant level. Therefore, the Proposed Project's contribution to cumulative wastewater impacts would be cumulatively considerable, and cumulative impacts would remain **significant and unavoidable**.

Stormwater Infrastructure

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable future projects within LACFCD's service area, would substantially increase stormwater runoff such that existing conveyance would require expansion or construction of new infrastructure that could result in significant environmental impacts.

Construction

Construction of the Proposed Project together with past, present, and reasonably foreseeable projects would result in temporary stormwater runoff associated with ground disturbance activities. Similar construction activities associated with cumulative development in the surrounding area would also temporarily increase stormwater runoff. However, construction activities would be required to comply with applicable NPDES permit requirements and stormwater pollution prevention measures, which would control runoff and minimize impacts to stormwater drainage systems. Because construction-related runoff would be temporary and regulated, the Proposed Project's contribution to cumulative stormwater impacts during construction would not be cumulatively considerable, and cumulative construction-related impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present and reasonably foreseeable future projects within LACFCD's service area, would increase impervious areas and stormwater runoff rates that existing or planned stormwater drainage facilities would require expansion or construction of new infrastructure, the construction of which could result in significant environmental impacts.

However, development projects would be required to comply with federal, State, and local stormwater regulations. These include preparation and implementation of stormwater management plans in accordance with the NPDEA MS4 permit, which requires provisions for the capture and infiltration of runoff or the temporary detention of stormwater runoff to reduce impacts related to hydrology and stormwater drainage facilities. Potential changes related to stormwater flows, drainage, impervious surfaces, and flooding would be minimized by the implementation of stormwater-control measures, retention, infiltration, and/or LID measures to reduce potential stormwater drainage and flooding impacts.

Additionally, development projects in the region would also be required to limit post-development runoff discharges per the requirements of County of Los Angeles Hydrology Manual and the County of Los Angeles Hydraulic Design Manual. Compliance with these requirements would ensure that stormwater runoff generated by new development would not exceed capacity of existing or planned stormwater discharge drainage systems.

Because compliance with these regulatory requirements would minimize increases in runoff and ensure that stormwater systems operate within their design capacity, the Proposed Project's contribution to cumulative stormwater infrastructure would not be cumulatively considerable. Thus, cumulative stormwater infrastructure impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Solid Waste

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable future projects within the applicable landfill service areas, would substantially increase solid waste generation such that existing landfill capacity would be exceeded or new or expanded solid waste facilities would be required that could result in significant environmental impacts.

The geographic area considered for cumulative impacts related to solid waste is the service areas of the landfills listed in Table 3.17-4, *Landfill Capacities in the City of Los Angeles*, and Table 3.17-5, *Landfill Capacities in the County of Los Angeles*.

Construction

Construction of the Proposed Project would generate construction and demolition waste. Similar construction activities associated with other past, present, and reasonably foreseeable future projects in the region would also generate temporary increases in construction and demolition waste. However, construction projects within the State of California are required to comply with applicable waste diversion regulations.

Pursuant to the County of Los Angeles Code of Ordinances Chapter 20.87, construction projects must divert at least 50 percent of generated construction and demolition debris for recycling or reuse. In addition, CALGreen requires that a minimum of 65 percent of nonhazardous construction and demolition waste be recycled and/or salvaged. Compliance with these requirements would substantially reduce the amount of construction waste requiring disposal in regional landfills.

Because construction-related waste generation would be temporary and diversion requirements would significantly reduce landfill disposal, the Proposed Project's contribution to cumulative solid waste disposal during construction would not be cumulatively considerable, and cumulative construction-related impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Operation of the Proposed Project would generate municipal solid waste from residential, commercial, educational, and other land uses. Similar waste generation would occur from other past, present, and reasonably foreseeable future projects within the region. The geographic area considered for cumulative impacts includes the landfills listed in Table 3.17-4 and Table 3.17-5.

Collectively, these landfills have a remaining disposal capacity of approximately 357 million tons. Two (Chiquita Canyon Sanitary Landfill and El Sobrante Landfill) of the four landfills have a disposal capacity beyond the 15-year planning horizon required by the California Integrated Waste Management Act (AB 939), to account for future demand and ensure adequate capacity. All cumulative projects would be required to divert construction waste pursuant to CALGreen requirements and abide by the applicable requirements of SB 183, AB 1826, and AB 341. Additionally, pursuant to the County of Los Angeles Code of Ordinances Chapter 20.87, the Proposed Project would need to divert 50 percent of all generated tonnage for recycling and reuse. In addition, CALGreen requires a minimum of 65 percent of the nonhazardous construction and demolition waste to be recycled and/or salvaged. These regulations would reduce the amount of solid waste that would enter the landfills during the construction phases of the Proposed Project. For the operational phases of the Proposed Project, the existing landfills in the surrounding area have capacity to serve the Proposed Project without reaching capacity. Thus, there is sufficient landfill capacity in the region for the cumulative increase in solid waste disposal. Therefore, the Proposed Project would not result in a cumulatively considerable impact related to solid waste and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Other Utilities

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable future projects within the applicable electricity, natural gas, and steam service areas, would substantially increase demand such that new or expanded electricity, natural gas, and steam service facilities would be required that could result in significant environmental impacts.

Electricity

The geographic area considered for cumulative impacts related to electricity is the service area of LADWP.

Construction

Construction of the Proposed Project would require the use of energy for purposes such as the operation of construction equipment and tools, and construction of cumulative projects may overlap. However, most construction equipment during demolition and grading is typically gasoline or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and finishing. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity

usage during construction activities. Therefore, the Proposed Project's contribution to cumulative electricity consumption during construction would not be cumulatively considerable, and cumulative construction-related impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Implementation of the Proposed Project in combination with other past, present, and reasonably foreseeable future projects within the LADWP service area could increase electricity consumption and result in the need for new or expanded electricity generation facilities beyond what LADWP is already planning for its service area.

However, development projects within the LADWP service area would be required to comply with federal, State, and local energy efficiency regulations. These include compliance with the current Energy Code and CALGreen standards in effect at the time individual applications are submitted to the County and City and can therefore be expected to be more energy-efficient than the current uses being replaced as these standards incrementally strengthen with each triennial code update (CEC 2026) and current code requirements are therefore more stringent than earlier code cycles that existing buildings would have been designed according to, resulting in reductions in electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. As part of the Energy Code, future development would need to meet energy efficiency standards for building envelope design, mechanical (e.g., ventilation, heating, cooling) and water distribution design, and on-site renewable power generation (e.g., rooftop solar). Meeting these standards would minimize electricity consumption through efficient building designs.

Because compliance with these regulatory requirements would promote greater efficiency performance in the design of the Proposed Project than current buildings are designed to, along with other projects in the LADWP service area, the Proposed Project's contribution to cumulative electricity consumption would not be cumulatively considerable. Thus, cumulative electricity consumption impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Natural Gas

The geographic area considered for cumulative impacts related to natural gas is the service area of SoCalGas.

Construction

Construction of the Proposed Project would require the use of energy for purposes such as the operation of construction equipment and tools, and construction of cumulative projects may overlap. However, most construction equipment during demolition and grading is typically gasoline or diesel powered, and the later construction phases would not require natural gas–powered equipment. Overall, the use of natural gas is not anticipated during the construction phase of the Proposed Project.

Therefore, the Proposed Project's contribution to cumulative natural gas consumption during construction would not be cumulatively considerable, and there would be **no impact** to cumulative construction-related impacts.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

Implementation of the Proposed Project in combination with other past, present, and reasonably foreseeable future projects within the SoCalGas service area could increase natural gas consumption and result in the need for new or expanded natural gas generation facilities beyond what SoCalGas is already planning for its service area.

However, development projects within the SoCalGas service area would be required to comply with federal, State, and local natural gas efficiency regulations. These include the Energy Code and CALGreen standards in effect at the time and would result in reductions in heating fuel (e.g., natural gas) consumption on a per dwelling unit and per square foot basis when compared to existing conditions.

Because compliance with these regulatory requirements would minimize natural gas consumption, the Proposed Project's contribution to cumulative natural gas consumption would not be cumulatively considerable. Thus, cumulative natural gas consumption impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Steam

The geographic area considered for cumulative impacts related to steam is the service area of the West Central Plant.

Construction

It is not anticipated that construction equipment used for the future development projects would be powered by steam, and no steam demand is anticipated during the Proposed Project's construction.

Therefore, the Proposed Project's contribution to cumulative steam consumption during construction would not be cumulatively considerable, and there would be **no impact**.

Significance without Mitigation: No impact. No mitigation is necessary.

Operation

As described in impact discussion (a), the West Central Plant would be decommissioned as part of the Proposed Project and a new energy system would be installed. The new energy system would be designed to meet current and future energy demands and would directly support initiatives like LA's Green New Deal targeting a zero-carbon grid and zero-carbon buildings by mid-century. With the new on-site energy system, the Project Site would achieve efficiency in energy use, balancing heating and cooling demands while recovering and reusing energy that would otherwise be wasted. Cumulative projects would not connect to the new energy system, therefore, the Proposed Project would **have no impact**.

Significance without Mitigation: No impact. No mitigation is necessary.

Telecommunications

Cumulative impacts would occur if the Proposed Project, together with past, present, and reasonably foreseeable future projects within the telecommunications service area, would substantially increase demand for telecommunications services such that construction of new or expanded telecommunications facilities would be required that could result in significant environmental impacts.

The geographic area considered for cumulative impacts is the service area of telecommunication facilities serving the City of Los Angeles.

Construction

Construction of the Proposed Project would require installation or connection of telecommunications infrastructure to serve the Project Site. Similar installation activities would occur for other past, present, and reasonably foreseeable future projects in the region. However, construction associated with telecommunications infrastructure typically involves installation of underground conduit, fiber-optic lines, or minor equipment within existing rights-of-way or developed areas.

These activities are common in urban environments and would occur on a limited and localized basis. Because installation of telecommunications infrastructure is routine and would not require construction of major new facilities, the Proposed Project's contribution to cumulative telecommunications construction impacts would not be cumulatively considerable, and cumulative construction-related impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Future development would install infrastructure supporting telecommunications services pursuant to the requirements of the County of Los Angeles Code of Ordinances. Given the already urbanized character of the City and County and the variety of telecommunications facilities available, the Proposed Project would not significantly alter land use patterns to the extent that construction of telecommunications facilities would be warranted. Therefore, the Proposed Project would not result in a cumulatively considerable impact on telecommunication facilities and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.17.6 Comparison to the 2014 Master Plan EIR Impact Analysis

The 2014 Master Plan EIR, as shown in Table 3.17-7, *Summary of the 2014 Master Plan EIR Utilities and Service Systems Impact Conclusions,* and this Draft SEIR resulted in similar impact conclusions. As described in Section 3.17.4, *Project Impact Analysis*, and Section 3.17.5, *Cumulative Impact Analysis*, the Proposed Project would result in potentially significant impacts related to water supplies and the capacity of wastewater facilities. The Proposed Project's total water demand amounts to a net increase of 356 AFY when compared to the 2014 Master Plan EIR. The Proposed Project's wastewater generation results in a net increase of 410,242 gpd when compared to the 2014 Master Plan EIR. In the 2014 Master Plan EIR, potentially significant impacts related to water supply and wastewater treatment capacity were identified, mitigation measures were created to address impacts on utilities and services (potable water demand and wastewater). These measures reduced two impacts; however, the impacts related to water supplies would remain significant and unavoidable (County of Los Angeles 2014).

Mitigation Measure USS-1 of the 2014 Master Plan EIR required a WSA. A WSA was prepared for the Proposed Project but since the buildout year of the proposed project is 2050 and the 2020 UWMP only projects supplies up to the year 2045, this impact could be significant and unavoidable for future development on the Project Site that are implemented between the year 2045 and 2050. Mitigation Measure USS-2 has been carried over from the 2014 Master Plan EIR and has been retained, to require further detailed gauging and evaluation to identify a specific sewer connection point with sufficient capacity. Because the location, scale, and timing of

potential conveyance improvements have not been identified and the environmental impacts of such improvements cannot be determined with the information currently available, it has been concluded that wastewater could be significant and unavoidable.

Implementation of Mitigation Measures USS-1 and USS-2 would reduce the Proposed Project's impacts; however, significant impacts would remain significant and unavoidable. Consistent with the findings from the 2014 Master Plan EIR, this Draft SEIR concludes the Proposed Project would result in significant and unavoidable impacts related to utilities and service systems. Appendix B to this Draft SEIR provides a strikeout/underline version of the mitigation measures to show changes compared to the 2014 Master Plan EIR.

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3.18 WILDFIRE

This chapter of the Draft SEIR discusses the existing wildfire conditions of the Project Site and City of Los Angeles and identifies applicable regulatory requirements. This chapter also identifies potential impacts that could result from future development and implementation of the Proposed Project.

During the Notice of Preparation (NOP) public review period, which was from September 26, 2025, to November 21, 2025, no comments were received regarding wildfire impacts associated with the proposed project. A CEQA scoping meeting was conducted on October 8, 2025, where no comments regarding wildfire were received. The NOP and all scoping comment letters are included as Appendix A, *Notice of Preparation and Scoping Comments*, of this document and are presented in Table 1-1, *Summary of Scoping Comments Received*.

3.18.1 Regulatory Framework

As the County of Los Angeles is the owner of the Project Site and the public agency involved in the development of the proposed Master Plan, the County of Los Angeles is the lead agency for the Proposed Project. Therefore, the Proposed Project is not subject to the City of Los Angeles' planning and zoning ordinances. The County remains subject to applicable federal and State laws, regulations, and policies. For coordination purposes, the County may consider aspects of local policies and regulations for the communities surrounding the Project Site when it is appropriate and feasible, although the County is not bound by those policies and regulations. Therefore, the City's local planning regulations are provided for informational purposes only.

FEDERAL

National Fire Protection Association Standards

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. NFPA standards are recommended (advisory) guidelines for fire protection that are incorporated by reference in the California Fire Code (CFC). Specific standards applicable to wildland fire hazards include, but are not limited to:

- NFPA 1141, Fire Protection Infrastructure for Land Development in Wildlands
- NFPA 1142, Water Supplies for Suburban and Rural Fire Fighting
- NFPA 1143, Wildland Fire Management
- NFPA 1144, Reducing Structure Ignition Hazards from Wildland Fire
- NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency (County of Los Angeles 2014).

STATE

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. CAL FIRE provides fire assessment and firefighting services for land in State Responsibility Areas (SRA), conducts educational and training programs, provides fire planning guidance and mapping, and reviews general plan safety elements to ensure compliance with State fire safety requirements. A State Responsibility Area (SRA) is an area where CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention (CAL FIRE 2025a). CAL FIRE staff, or a designee, reviews building permit applications, parcel maps, and use permits for construction or development in SRAs and Local Responsibility Areas (LRA).

The Board of Forestry and Fire Protection is a government-appointed approval body within CAL FIRE. It is responsible for developing the general forest policy of the State, determining the guidance policies of CAL FIRE, and representing the State's interest in federal forestland in California. The Board of Forestry and Fire Protection also provides regulations and approves general plan safety elements that are adopted by local governments for compliance with State statutes.

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. These responsibilities include regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and renewing regulations and building standards; and providing training and education in fire protection methods and responsibilities. These are accomplished through major programs, including engineering, education, enforcement, and support from the Board of Forestry and Fire Protection. For jurisdictions in SRAs or very high fire hazard severity zones (FHSZ), the Land Use

Planning Program division of the Office of State Fire Marshal reviews safety elements during the update process to ensure consistency with California Government Code, Section 65302(g)(3). The Office of State Fire Marshal also reviews subdivisions of more than 30 dwelling units in SRAs or very high FHSZs without secondary means of egress that are at significant fire risk, and provides recommendations to improve subdivision fire safety.

Together, the Board of Forestry and Fire Protection, Office of State Fire Marshal, and CAL FIRE protect and enhance the forest resources of all wildland areas of California that are not under federal jurisdiction.

Fire Hazard Severity Zones and Responsibility Areas

CAL FIRE designates FHSZs as authorized under California Government Code Sections 51175 et seq. FHSZs are designated as Very High, High, or Moderate. CAL FIRE considers many factors when designating FHSZs, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. CAL FIRE designates FHSZs in two types of areas depending on which level of government is financially responsible for fire protection (CAL FIRE 2025a).

- **Local Responsibility Area (LRA).** Incorporated communities or special districts are financially responsible for wildfire protection.
- **State Responsibility Area (SRA).** CAL FIRE and contracted counties are financially responsible for wildfire protection.

CAL FIRE Strategic Fire Plan

The 2024 CAL FIRE Strategic Plan contains goals and objectives to prepare for and mitigate the effects of fire on California's natural and built environments (CAL FIRE 2024a). The 2024 Strategic Plan focuses on strengthening the department's capabilities to provide effective fire prevention and suppression activities statewide to protect lives, property, and ecosystems. A key component of the 2024 Strategic Plan is the collaboration within the department to ensure fire suppression and natural resource management is successful (CAL FIRE 2024a).

State Responsibility Area and Very High Fire Hazard Severity Zone Fire Safe Regulations

California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 2, SRA/Very High FHSZ Fire Safe Regulations, establishes minimum wildfire protection standards for construction and development in the SRA and very high FHSZs and requires CAL FIRE to review development proposals and enact recommendations that serve as conditions of approval in these zones. These standards include basic emergency access and perimeter wildfire protection measures; signing and building numbering; private water supply resources for emergency fire use; and vegetation modification. These regulations apply to all residential, commercial, and

industrial buildings in the SRA and very high FHSZs in the LRA; the siting of new mobile homes; all tentative and parcel maps; and applications for building permits approved before 1991 when these standards were not proposed. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. Section 1273.08, Dead-End Roads, of these standards provides regulations for the maximum lengths of single-access roadways:

- Parcels zoned for less than 1 acre: 800 feet
- Parcels zoned for 1 acre to 4.99 acres: 1,320 feet
- Parcels zoned for 5 acres to 19.99 acres: 2,640 feet
- Parcels zoned for 20 acres or larger: 5,280 feet

Fire Safe Regulations, Section 1299.03, Fire Hazard Reduction Around Buildings and Structure Requirements, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.

California Code of Regulations Section 1299.02

CCR Section 1299.02 defines defensible space as the buffer landowners are required to create on their property between a "Building or Structure" and the plants, brush, and trees or other items surrounding the "Building or Structure" that could ignite in the event of a fire. A building or structure is defined as anything constructed that is designed or intended for support, enclosure, shelter, or protection of persons, animals, or property, having a permanent roof that is supported by walls or posts that connect to, or rest on the ground.

California Building Standards Code

The California Buildings Standards Code (CCR Title 24) provides 12 codes for construction and buildings in California. This code is updated every three years, with the most recent version effective January 1, 2026. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. The County of Los Angeles adopted the most recent version of the California Building Standards Code, with modifications, into the County of Los Angeles Code of Ordinances, Title 26, Building Code, effective January 1, 2026.

California Building Code

The California Building Code (CBC), CCR Title 24, Part 2, identifies building design standards, including those for fire safety. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC and any applicable local edits. Typical fire safety requirements of the CBC include the installation of sprinklers in buildings and

other facilities; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction in very high FHSZs; requirements for smoke-detection systems; exiting requirements; and the clearance of debris.

Chapter 7A of the CBC, *Materials and Methods for Exterior Wildfire Exposure*, prescribes building materials and construction methods for new buildings in an FHSZ or wildland-urban interface (WUI) fire area. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other requirements include vegetation management compliance, as prescribed in the CFC Section 4906 and PRC Section 4291.

California Fire Code

The CFC incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in CCR Title 24, Part 9. The CFC regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Fire Safety During Construction and Demolition

Chapter 33 of the CFC, *Fire Safety During Construction and Demolition*, provides requirements for fire safety precautions during construction and demolition of a development project. The purpose of this chapter is to provide reasonable safety to life and property from fire during construction and demolition operations, including those in underground locations. Specific requirements include prohibiting smoking on-site, except for in approved areas; the code also provides requirements related to the management of combustible materials and debris, cutting and welding, electrical wiring, and cooking. Additional requirements include the preparation of site safety plans prior to building permit issuance, providing fire watch during nonworking hours, and maintaining water supply for fire protection as soon as combustible materials arrive on a project site.

Wildland-Urban Interface Areas

Chapter 49 of the CFC, *Requirements for Wildland Urban Interface Fire Areas*, applies to any geographical area identified as an FHSZ by CAL FIRE. It defines FHSZs; connects to the SRA/Very High FHSZ Fire Safe Regulation requirements for defensible space; and parallels requirements

for wildfire protection, buildings construction, and hazardous vegetation fuel management in other sections of the CCR and the PRC. Chapter 49 of the 2022 CFC includes a definition for the WUI and provides requirements for fire protection plans, landslide plans, long-term vegetation management, and creation and maintenance of defensible space for all new development in the WUI.

California Public Utilities Commission

In 2007, wildfires in southern California were ignited by overhead utility power lines and aerial communication facilities near power lines. In response, the California Public Utilities Commission (CPUC) began considering and adopting regulations to protect the public from fire hazards due to overhead power lines and nearby aerial communication facilities. The CPUC published a Fire-Threat Map under Rulemaking 15-05-006, following procedures in Decision 17-01-009, revised by Decision 17-06-024, which adopted a work plan for the development of a utility high fire-threat district where enhanced fire safety regulations in Decision 17-12-024 apply (CPUC 2025). Fire regulations require electric utilities to:

- Prioritize the correction of safety hazards.
- Correct nonimmediate fire risks in "Tier 2" (elevated fire threat) areas on the CPUC high fire-threat district within 12 months, and in "Tier 3" (extreme fire threat) areas within 6 months.
- Maintain increased clearances between vegetation and power lines within the high fire-threat district.
- Maintain stricter wire-to-wire clearances for new and reconstructed facilities in Tier 3 areas.
- Conduct annual inspections of overhead distribution facilities in rural areas of Tier 2 and Tier 3 areas.
- Prepare a fire prevention plan annually if overhead facilities exist in the high fire-threat district. (CPUC 2017)

California Government Code

California Government Code Sections 65302(g) and 65302.15 require that safety elements be reviewed and revised as needed with the revision of a housing element or local hazard mitigation plan, but no less than every eight years, to ensure the goals, policies, actions, mapping, and background content are consistent with State regulations and reflect the best available information for wildfire risks, climate adaptation and resiliency, and emergency evacuation routes for certain residential areas. Communities with local hazard mitigation plan updates after January 1, 2022, must also ensure their safety elements or local hazard mitigation plans include an assessment of evacuation routes and their capacity, safety, and viability as well as evacuation locations under a range of emergency scenarios.

For wildfire and evacuation purposes, a safety element must:

- Identify wildfire hazards with the latest fire severity zone maps from the Board of Forestry and Fire Protection, United States Geological Survey, and other sources.
- Consider guidance given by the Governor's Office of Land Use and Climate Innovation's Fire Hazard Planning document.
- Demonstrate that the jurisdiction or contract agency and associated codes satisfactorily address adequate water supply, egress requirements, vegetation management, street signage, land use policies, and other criteria to protect from wildfires.
- Establish a set of comprehensive goals, policies, and feasible implementation measures for protection of the community from unreasonable risks of wildfire.
- Identify evacuation-constrained residential parcels in hazard-prone areas.

Fire Hazard Technical Advisory

The Governor's Office of Land Use and Climate Innovation (formerly the Governor's Office of Planning and Research) published the Fire Hazard Technical Advisory in 2015 and revised it in 2022 as a planning guide for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. The Fire Hazard Technical Advisory provides a range of goals, policies, and programs for fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery. The 2022 update includes specific land use strategies to reduce fire risk to buildings, infrastructure, and communities (LCI 2022).

California Environmental Quality Act

In November 2022 the California Attorney General issued "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" (AG 2022). This guidance document was designed to help lead agencies comply with CEQA (PRC Section 21000 et seq) when considering whether to approve projects in wildfire-prone areas. This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation. The guidance is aimed at proposed development projects, such as residential, recreational, or commercial developments. The extent to which it applies to a project varies by project based on project design and location. It does not impose additional requirements on local governments or alter any applicable laws or regulations but is intended to provide guidance on some of the issues, alternatives, and mitigation measures that should be considered during the environmental review process.

LOCAL

County of Los Angeles General Plan

The Safety Element of the County of Los Angeles General Plan 2035 (LA County General Plan 2035) (County of Los Angeles 2025a) includes the following policies related to wildfire, emergency response, and evacuation that would be applicable to the Proposed Project:

- **Policy S 2.2.** Plan for future climate impacts on critical infrastructure and essential public facilities.
- **Policy S 2.3.** Require new residential subdivisions and new accessory dwelling units within hazard areas to meet required evacuation standards.
- **Policy S 3.6.** Infiltrate development runoff on-site, where feasible, to preserve or restore the natural hydrologic cycle and minimize increases in stormwater or dry weather flows.
- **Policy S 4.1.** Prohibit new subdivisions in very high FHSZs unless: (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.
- **Policy S 4.2.** New subdivisions shall provide adequate evacuation and emergency vehicle access to and from the subdivision on streets or street systems that are evaluated for their traffic access or flow limitations, including but not limited to weight or vertical clearance limitations, dead-end, one-way, or single lane conditions.
- **Policy S 4.4.** Reduce the risk of wildland fire hazards through meeting minimum state and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.
- **Policy S 4.6.** Ensure that infrastructure requirements for new development meet minimum State and local regulations for ingress, egress, peak load water supply availability, anticipated water supply, and other standards within FHSZs.
- **Policy S 4.7.** Discourage building mid-slope, on ridgelines and on hilltops, and employ adequate setbacks on and below slopes to reduce risk from wildfires and post-fire, rainfall induced landslides and debris flows.
- **Policy S 4.8.** Support the retrofitting of existing structures in FHSZs to meet current safety regulations, such as the building and fire code, to help reduce the risk of structural and human loss due to wildfire.

- **Policy S 4.12.** Support efforts to incorporate systematic fire protection improvements for open space, including the facilitation of safe fire suppression tactics, standards for adequate access for firefighting, fire mitigation planning with landowners and other stakeholders, and water sources for fire suppression.
- **Policy S 4.14.** Encourage the strategic placement of structures in FHSZs that conserves fire suppression resources, increases safety for emergency fire access and evacuation, and provides a point of attack or defense from a wildfire.
- **Policy S 4.16.** Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.
- **Policy S 4.17.** Coordinate with agencies, including the Fire Department and ACWM, to ensure that effective fire buffers are maintained through brush clearance and fuel modification around developments.
- **Policy S 4.18.** Require Fire Protection Plans for new residential subdivisions in FHSZs that minimize and mitigate potential loss from wildfire exposure, and reduce impact on the community's fire protection delivery system.
- **Policy S 4.19.** Ensure all water distributors providing water in unincorporated Los Angeles County identify, maintain, and ensure the long-term integrity of future water supply for fire suppression needs, and ensure that water supply infrastructure adequately supports existing and future development and redevelopment, and provides adequate water flow to combat structural and wildland fires, including during peak domestic demand periods.
- **Policy S 4.20.** Prohibit new and intensification of existing general assembly uses in very high FHSZs unless: (1) the use is located in an existing approved specific plan or (2) the County determines there is sufficient secondary egress and the County determines the adjoining major highways and street networks are sufficient for evacuation, as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new general assembly uses in all other FHSZs.
- **Policy S 7.1.** Ensure that residents are protected from the public health consequences of natural or manmade disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 7.2.** Support County emergency providers in reaching their response time goals.
- **Policy S 7.3.** Coordinate with other County and public agencies, such as transportation agencies, and health-care providers on emergency planning and response activities, and evacuation planning.
- **Policy S 7.5.** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

- **Policy S 7.6.** Ensure that essential public facilities are maintained during disasters, such as flooding, wildfires, extreme temperature and precipitation events, drought, and power outages.

County of Los Angeles All-Hazards Mitigation Plan

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The County of Los Angeles All-Hazards Mitigation Plan (HMP) was prepared and adopted in May 2020 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The HMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the County. In the context of an HMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The HMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide (County of Los Angeles 2020).

County of Los Angeles Operational Area Emergency Operations Plan

The County of Los Angeles Office of Emergency Management is responsible for coordinating agency response to disasters or other large-scale emergencies in the county. The County of Los Angeles Operational Area Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials (OEM 2023).

Los Angeles County Fire Department 2021 Strategic Fire Plan

The Los Angeles County Fire Department 2021 Strategic Fire Plan provides an overview of the fire landscape in the County of Los Angeles in incorporated and unincorporated areas. The plan also provides pre-fire management strategies and tactics to reduce the risk of fire affecting people and structures. These strategies include fire prevention, vegetation management, a robust fire protection system, and individuals division and battalion program plans. The plan also provides a list of pre-fire projects to reduce wildfire risk throughout the county (LACFD 2021).

County of Los Angeles Code of Ordinances

The County of Los Angeles Code of Ordinances sets forth regulations and standards to protect public health and safety, including fire protection and emergency access. In particular, Title 32 of the County Code adopts and amends the California Fire Code to ensure fire safety and emergency access for new development projects. These provisions are intended to ensure that construction activities do not obstruct fire apparatus access roads and that fire protection measures are maintained during all phases of construction. The County of Los Angeles Code of Ordinances sets forth the following specific regulations regarding fire safety measures during construction activities, specifically:

- **Title 32, Section 503** (Fire Apparatus Access Roads) requires that designated fire access roads be maintained free and clear of obstructions at all times, ensuring that emergency vehicles have adequate access to building sites, staging areas, and occupied structures.
- **Title 16, Section 16.06.010** et seq. (Encroachments and Work in County Highways) requires a permit for temporary lane closures, excavations, or any work conducted within a County-maintained public right-of-way. These provisions ensure that traffic control measures are implemented and that emergency access is preserved during construction.

City of Los Angeles General Plan

The Safety Element of the City of Los Angeles General Plan (General Plan) contains goals, objectives, and policies for how the City plans for disasters, including wildfire (City of Los Angeles 2021). The following objectives and policies are related to wildfire:

Objective 1.1: Implement comprehensive hazard mitigation plans and programs that are integrated with each other and with the City's comprehensive emergency response and recovery plans and programs.

- **Policy 1.1.3 Facility/Systems Location and Maintenance.** Locate new critical facilities and infrastructure outside of hazard areas, especially very high FHSZs, when feasible. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve essential community needs during and after disaster events. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions and the growing climate emergency.
- **Policy 1.1.6 State and Federal Regulations.** Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the LAMC to ensure that new development meets or exceeds Statewide minimums. Ensure new development in very high FHSZs adheres to the California Building Code, the California Fire

Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes.

- **Policy 1.1.8 Land Use.** Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as very high FHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.

Objective 1.2: Confront the global climate emergency by setting measurable targets for carbon reduction that are consistent with the best available methods and data, center equity and environmental justice, secure fossil free jobs, and foster broader environmental sustainability and resiliency.

- **Policy 1.2.2 Renewable Energy.** Aggressively pursue renewable energy sources, transitioning away from fossil based sources of energy and toward 100% renewable energy sources.
- **Policy 1.2.4 Clean and Healthy Buildings.** Design, build and rebuild buildings using passive energy principals, advanced efficiency and safety measures, and on-site renewable energy.
- **Policy 1.2.5 Housing and Development.** In keeping with the Housing Element, create housing opportunities that enhance affordability, equity, livability, sustainability and resilience.

Northeast Los Angeles Community Plan

The Project Site is within the boundaries of the Northeast Los Angeles Community Plan (City of Los Angeles 1999). The following goal, objective, and policy are related to wildfire:

Goal 9: Adequate community protection through a comprehensive fire and life safety program.

Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.

- **Policy 9-1.1**. Promote land use policies that enhance accessibility for firefighting equipment and are compatible with effective levels of service.

City of Los Angeles Base Emergency Operations Plan

The EOP for the City of Los Angeles outlines the City's response framework for all hazards. It serves as the foundation for emergency response within the City of Los Angeles and delineates coordination before, during, and after an event occurs. The EOP outlines the activities of all City of Los Angeles departments and partner agencies within a Citywide emergency management system and it embraces the capabilities and resources in the broader emergency management community that includes individuals, businesses, nongovernmental organizations, tribal governments, other cities, counties, states, national, and international assistance. The EOP

describes the fundamental systems, strategies, policies, assumptions, responsibilities, and operational priorities the City of Los Angeles will utilize to guide and support emergency management efforts (City of Los Angeles 2023).

City of Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) sets forth regulations and standards to ensure public health, safety, and welfare during construction and operation of development projects. In particular, Chapter 5, Article 7 of the LAMC, known as the Fire Code, provides fire protection and emergency access standards throughout the city. The LAMC sets forth the following specific regulations regarding fire safety measures during construction activities:

- **Chapter V, Article 7, Section 57.503** (Fire Apparatus Access Roads) requires that fire access roads remain clear and unobstructed at all times to allow emergency vehicles to reach buildings, structures, and staging areas.
- **Chapter VI, Article 2, Section 62.61** (Excavation in Public Streets) requires a permit for any excavation, lane closure, or encroachment within the public right-of-way. This section also requires contractors to prepare and implement traffic control plans that maintain emergency access during construction activities.

3.18.2 Existing Conditions

WILDFIRE BACKGROUND

According to Public Resources Code Sections 4103 and 4104, the term “wildfire” refers to any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Historically, wildfires commonly occurred in steep or heavily vegetated areas, away from developed areas. More recently, wildfires have been encroaching into more urban areas, or the wildland-urban interface, threatening homes, businesses, and essential infrastructure. Though wildfires play an important role in the ecology of many natural habitats, risks to human safety and property increase as urban development moves into areas susceptible to wildfire hazards.

Types of Wildfires

There are three basic types of wildland fires:

- **Crown fires** burn trees to their tops; these are the most intense and dangerous wildland fires.
- **Surface fires** burn surface litter and duff. These are the easiest fires to extinguish and cause the least damage to the forest. Brush and small trees enable surface fires to reach treetops and are thus referred to as *ladder fuels* (NRC 2021).

- **Underground fires** occur underground in deep accumulations of dead vegetation. These fires move very slowly but can be difficult to extinguish.

Wildfires burn in many types of vegetation—forest, woodland, scrub (including chaparral and sage scrub), and grassland. Many species of native California plants are adapted to fire and habitats such as woodlands, chaparral, and grasslands can recover from fire. Between 2020 and 2025 an average of 856,923 acres burned per year throughout California (CAL FIRE 2025a). Wildfires have been observed to be more frequent and growing in intensity over the past several years, with 4,304,379 acres and 2,569,386 acres burning in 2020 and 2021 across the State, respectively (CAL FIRE 2024b).

Wildfire Causes

Although the term *wildfire* suggests natural origins, a 2017 study that evaluated 1.5 million wildfires in the United States between 1992 and 2012 found that humans were responsible for igniting 84 percent of wildfires, accounting for 44 percent of acreage burned (Balch et al. 2017). The three most common causes of human-caused wildfires are debris burning (logging slash, farm fields, trash, etc.); arson; and equipment use (Pacific Biodiversity Institute 2007).[1] Lightning is the major natural cause of wildfire in the United States, with more than 40 percent of wildfires in the western United States caused by lightning between 1992 and 2015 (Balch et al. 2017; Cart 2023).

Power lines can ignite wildfires in several ways, including:

- **Downed lines.** Downed power lines can produce arcing that can cause the powerlines to spark and ignite vegetation.
- **Vegetation contact.** A branch contacting two conductors for a sufficient duration may ignite the branch; a tree falling on a line can cause a downed line.
- **High winds and severe weather.** Conductors can slap together during high winds and severe weather, creating arcing of the powerlines and ejecting hot metal particles that can ignite flammable matter on the ground.
- **Equipment failures.** As circuit components deteriorate, they can arc and spark and thus ignite nearby flammable matter (Texas Wildfire Mitigation Project 2014).

An analysis of US Forest Service wildfire data from 1986 to 1996 determined that 95 percent of human-caused wildfires, and 90 percent of all wildfires, occurred within 0.5 mile of a road; and that about 61 percent of all wildfires and 55 percent of human-caused wildfires occurred within approximately 650 feet (200 meters) of a road (Pacific Biodiversity Institute 2007). The study

[1] Miscellaneous human activities (unspecified) are ranked above equipment use in percentage of wildfires caused.

concluded that the increase in human-caused ignition from new roads greatly outweighs the benefits of increased access for firefighters.

Wildfires ignite structures in three ways: embers landing on the structure or flammable material next to the structure, direct flame contact, and radiant heat from fire close to the structure. Embers are the most common cause of home ignition. Embers ignite structures by entering through attic vents, igniting flammable materials around the home (litter in the roof gutter; wood stacks; or wood fencing), or finding their way under roofing materials (CCI 2024).

CAL FIRE estimated in 2017 that there were about three million housing units in California in FHSZs and potentially at risk from wildland fire—that is, just over 20 percent of the total housing units in the state (CAL FIRE 2018). A more recent study conducted by the *Los Angeles Times* indicates that an additional 2.8 million Californians' homes were added to the FHSZs due to the recent updates of the FHSZ maps in both the SRA and LRA (Los Angeles Times 2025). According to CAL FIRE data, approximately 95 percent of structures seriously damaged in California wildfires from 2013 to 2020 took place in FHSZs in the SRA or LRA or on federal lands (CapRadio 2021).

Secondary Effects of Wildfire

After a high intensity wildfire is suppressed, the burn scar is typically bare of its vegetative cover, which had supported the hillsides and steeper slopes. As a result, rainstorms increase the possibility of severe landslides and debris flow in these areas. The intense heat from the fire can also cause a chemical reaction in the soil that makes it less porous, causing water to run off during precipitation events, which can lead to flooding downstream.

In addition to damaging natural environments, wildfires can injure and cause fatalities of residents and firefighters as well as damage or destroy structures and personal property. Wildfires also deplete water reserves, down power lines, disrupt communication services, and block evacuation routes. Wildfires can also indirectly cause flooding if flood control facilities become inadequate to handle increases in stormwater runoff, sediment, and debris that are likely to be generated from burn scars. Regionally, smoke from wildfires creates poor air quality that can last for days or weeks, depending on the scale of the wildfire and wind patterns.

Wildland-Urban Interface

The WUI is any area where structures and other human developments meet or intermingle with wildland vegetative fuels—shrubs, trees, and grasses. Developments in the WUI exacerbate fire occurrence and fire spread in several ways:

- Increased numbers of people near and in wildland areas, creating more frequent human-caused wildfires.

- Wildfires become harder to fight due to simultaneous evacuation and firefighting resources diverted from containing the wildfire to protecting lives and homes.
- Letting natural fires burn becomes impossible, leading to buildup of fuel in brush and forested areas and overgrowth of grasslands, increasing wildfire hazard further (Radeloff et al. 2018).

The Project Site and surrounding area are located outside of the WUI (USFS 2025).

PROJECT SITE

The County-owned Project Site is within the boundaries of the Northeast Los Angeles Master Plan area between the Boyle Heights and Lincoln Heights neighborhoods of the City of Los Angeles and surrounded by urban development. The Project Site is not in an SRA and is not in an area classified as a very high FHSZ by CAL FIRE. The Project Site is located within a local responsibility area; however, the Project Site is not located within a fire hazard severity zone. As shown in Figure 3.18-1, *Fire Hazard Severity Zones*, the nearest land designated as a very high FHSZ in a LRA is approximately 0.45 mile north of the Project Site (CAL FIRE 2025c). The nearest land in an SRA and classified as a very high FHSZ is approximately 10 miles southeast of the Project Site (CAL FIRE 2025c).

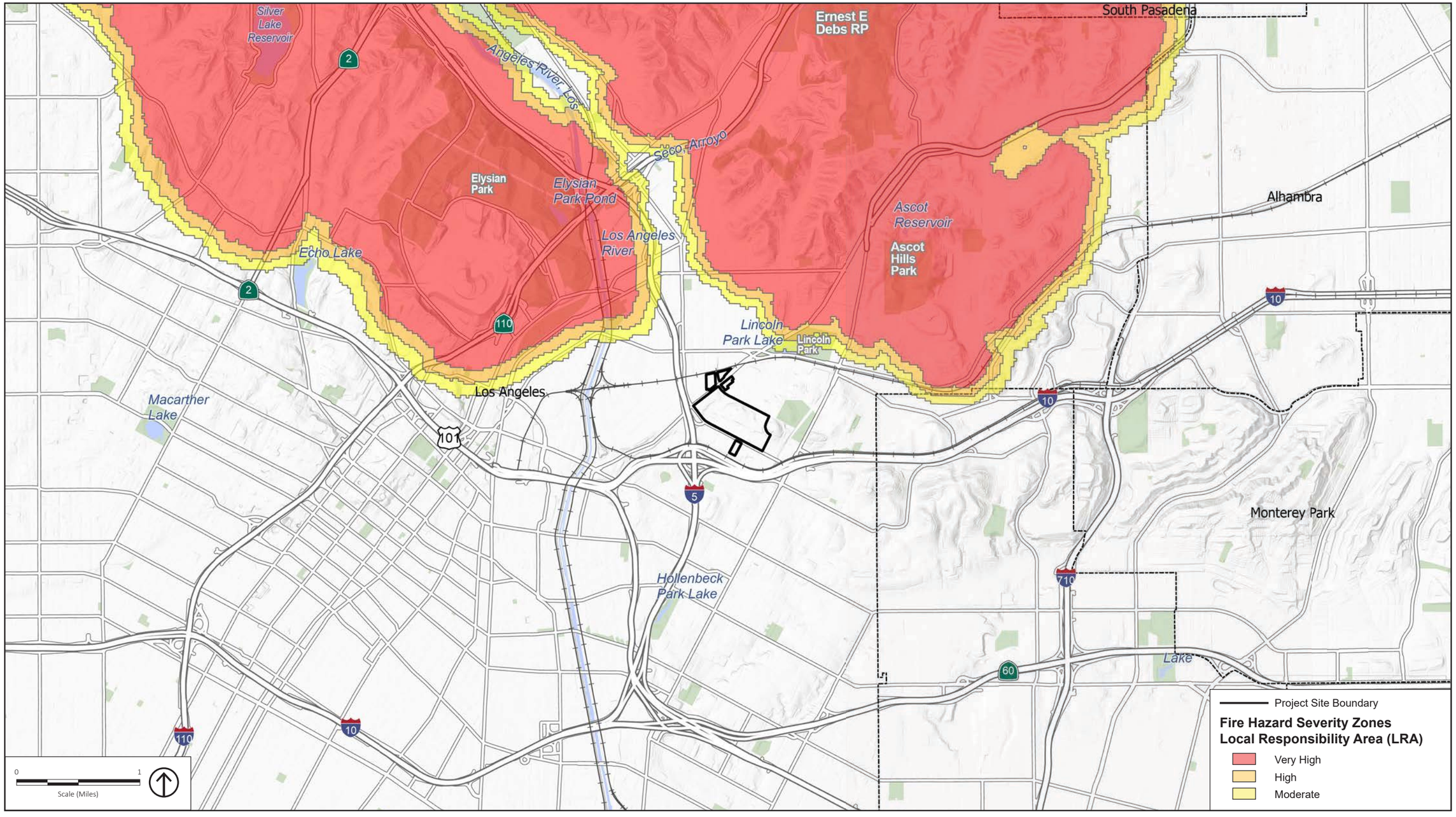
WILDFIRE HISTORY

According to the CAL FIRE historic wildfire perimeter database, there have been five named fires within two miles of the Project Site in the past (CAL FIRE 2025d).

- 1929: Curan #17 Fire, 139.10 acres
- 1985: Montecito Fire, 8.49 acres
- 1992: Idyllwild Fire, 5.29 acres
- 1992: Avenue 5 Fire, 25.74 acres
- 1993: Thorpe Fire, 9.02 acres

No wildfires have been reported within the boundaries of the Project Site.

Figure 3.18-1 - Fire Hazard Severity Zones



Source: CALFIRE 2025.

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Factors Influencing Wildfire

Several factors influence wildfire conditions and facilitate the spread of wildfires, including topography, fuels, weather conditions, and climate change. Human actions are the leading cause of wildfires in California, increasing the risk of wildfire devastating natural lands and communities.

Weather

Wind is a primary weather factor of wildfire behavior. Santa Ana winds are warm easterly winds that flow from the Great Basin through the desert and through the passes of the coastal mountains. As wind speeds increase, the rates of fire spread, intensity, and ember spread potential also increase. Gusty and erratic wind conditions, like Santa Ana winds, can cause a wildfire to spread irregularly, making it difficult to predict its path and effectively deploy fire suppression forces. Winds from the southeast in the fall compound the severity of fire conditions, as does lower relative humidity, creating red-flag conditions. Santa Ana winds are especially dangerous because they are accompanied by low humidity, which can dry out trees and other fuel that may also be weakened by the winds. This can increase wildfire conditions in the area. Wind shifts can also occur suddenly due to temperature changes and interactions with steep slopes or hillsides, causing fires to spread unpredictably. Relative humidity is also an important fire-related weather factor. As humidity levels drop, the dry air causes vegetation moisture levels to decrease, thereby increasing the likelihood that plant material will readily ignite and burn; the risk of wildfire increases when lightning strikes during dry periods.

The climate in the greater City of Los Angeles area is generally referred to as “Mediterranean,” with hot, dry summers and cool, wet winters. Warm summers and cold winters with rainfall are common in the City. Because the summer months are generally hot and dry, the risk of wildfires has historically been greatest in summer and fall, though recent wildfires have occurred in winter months. Wind in the Project Site area typically blows from the west or southwest as part of the prevailing coastal wind pattern; however, during the fall and winter months, strong offshore Santa Ana winds may occur, blowing from the northeast toward the coast and increasing wildfire risk (NOAA 2000).

Fuel

Each type of vegetation contributes to fire hazard severity to varying degrees. The qualities of vegetation that directly influence fire risk include fuel type and size; loading’; arrangement; chemical composition; and dead and live fuel moisture, which contributes to the flammability characteristics of the vegetation. Grass and brush fuel types react quickly to changes in weather such as low humidity or high wind speeds. Fires in areas covered by this vegetation type can spread quickly in gusty wind conditions. The Project Site and surrounding area are primarily urban and lack vegetative fuels. Ornamental landscaping is present in some locations, but it is limited and maintained.

Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up- slope and slower spread down-slope in the absence of wind. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind. The Project Site is entirely developed and contains various impervious surfaces and buildings. Approximately 20 percent of the slopes on the Campus exceed 10 percent; elevations in the Campus range from approximately 320 feet in the southwest to 450 feet in the northeast. Overland flow within the Project Site is generally from the northeast to the southwest. The flow of on-site runoff is driven by the natural site topography, and the majority of runoff flows toward the historic creek and drains into the existing storm drain that is maintained by the LACFCD.

Though there is a steep east-west slope with some vegetation in the center of the Project Site (west of State Street), it is isolated and within the fully developed Campus. It is not connected to other natural steep slopes or vegetation. As discussed in Chapter 3.6, *Geology and Soils* of this Draft SEIR, a site investigation did not identify any indications of landsliding, and the Project Site and its immediate vicinity are not mapped within an earthquake-induced landside area. The Project Site is fully developed and is not in proximity to steep slopes, natural drainage courses, dams, or large bodies of water.

Human Actions

Most wildfires are ignited by human action, the result of direct acts of arson, carelessness, or accidents. Many fires originate in populated areas along roads and around homes and are often the result of the careless disposal of cigarettes, mowing of dead grass, electrical equipment malfunction, use of equipment, or burning of debris. Recreation areas with increased human activity that are in high or very high fire hazard areas also increase the potential for wildfires. The Project Site and surrounding area are located within a fully urbanized portion of the City of Los Angeles. As a result, the types of human activities typically associated with wildfire ignitions such as vegetation clearing, debris burning, or recreation in heavily vegetated areas, are generally limited in the Project vicinity. Vegetation on and around the Project Site primarily consists of ornamental landscaping that is regularly maintained and irrigated, which reduces the accumulation of dry fuels that could contribute to fire ignition or spread.

FIRE PROTECTION RESOURCES

The City of Los Angeles Fire Department (LAFD) provides firefighting and emergency response services to the Project Site. As discussed in Chapter 3.13, *Public Services*, of this Draft SEIR, the Project Site is served by two fire stations that provide fire and emergency medical services:

- **Station 1:** 2230 Pasadena Avenue, Los Angeles, CA 90031-2212
- **Station 2:** 1962 East Cesar E. Chavez Avenue, Los Angeles, CA 90031-2212

EVACUATION AND ACCESS

Evacuation routes are designated roadways that allow many people to quickly leave an area due to a potential or imminent disaster. These routes should have sufficient capacity to accommodate the needs of the community, be safely and easily accessible, and allow people to travel far enough away to be safe from emergency conditions.

The Project Site is in the County of Los Angeles Operational Area. Disaster routes are freeway, highway, or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing, and restoration over all other roads. The disaster routes in the vicinity of the Project Site include Interstate (I-) 10, I-5, Marengo Street, North Mission Road, North Soto Street, Valley Boulevard, and North Main Street (County of Los Angeles Public Works 2025).

The emergency operation center (EOC) for the City of Los Angeles is at 500 E Temple Street, approximately 1.5 miles southwest of the Project Site, which is a key point for coordination of the City's emergency planning, training, response and recovery efforts (EMD 2025). The County utilizes Ready LA County, an opt-in mass notification system, to provide critical information quickly in a variety of situations, such as severe weather, unexpected road closures, evacuation of buildings or neighborhoods, criminal activity, and emergency preparedness information (County of Los Angeles 2025b). Emergency response and disaster coordination for the Project Site would be provided by County agencies, including the County of Los Angeles Fire Department, which are responsible for responding to fires and other emergency incidents within the County's operational area.

3.18.3 Standards for Analysis

SIGNIFICANCE THRESHOLDS

Appendix G, "Environmental Checklist Form," of the State CEQA Guidelines, Section XIII, states that, "If located in or near state responsibility areas or lands classified as very high fire hazard severity zones," the Proposed Project would result in a significant impact related to wildfire if it would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

METHODOLOGY

Though the Project Site is not in or near an SRA, it is approximately 0.45 mile from lands classified as very high FHSZ in the LRA. Wildfire impacts were evaluated by reviewing existing wildfire maps provided by CAL FIRE. Information was compiled from regional and local planning documents, including the LA County General Plan, City of Los Angeles General Plan, and the Northeast Los Angeles Community Plan, which were reviewed to provide insight into wildfire risks in the vicinity of the Project Site. This analysis evaluates the Proposed Project's consistency with applicable City and County plans and policies related to wildfire as well as any potential impacts resulting from construction and operation of the Proposed Project.

OVERVIEW OF 2014 MASTER PLAN EIR IMPACT CONCLUSIONS

As a Subsequent EIR, this SEIR will provide a comprehensive update of the 2014 Master Plan EIR upon County certification and will be the first-tier environmental document for future projects and activities on the Campus. This section provides an overview of the impact conclusions in the 2014 Master Plan EIR for comparative purposes with the analysis of the Proposed Project in Section 3.1.4, *Project Impact Analysis*, and 3.1.5, *Cumulative Impact Analysis*.

The explicit requirement to evaluate impacts related to wildfire in CEQA documents was implemented subsequent to completion of the 2014 Master Plan EIR. The topic of wildfire was not a separate environmental topic in Appendix G of the State CEQA Guidelines until January 1, 2019 when the Natural Resources Agency updated Appendix G of the State CEQA Guidelines to include this topic in Appendix G. Prior to this change, impacts related to fire hazards were addressed in the Hazards and Hazardous Materials topic. Wildfire was addressed in the 2014 Master Plan EIR as part of the Hazards and Hazardous Materials and Utilities and Service Systems sections. The NOP/IS prepared for the 2014 Master Plan EIR determined that no

impacts would occur related to wildland fire. No mitigation measures related to wildfire were outlined in the 2014 Master Plan EIR.

3.18.4 Project Impact Analysis

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the Proposed Project would result in a significant impact related to wildfire if it would:

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Adopted emergency response plans and emergency evacuation plans include those discussed under Section 3.18.1, *Regulatory Framework*, such as County of Los Angeles Operational Area Emergency Operations Plan and the City of Los Angeles Base Emergency Operations Plan. The Proposed Project could result in a significant impact if it would substantially impair the implementation of these plans. The Proposed Project would be consistent with both emergency operations plans as it would not obstruct or eliminate designated disaster routes, would maintain required emergency access widths and clearances, and would be designed and constructed in compliance with applicable fire, building, and access codes. Improvements under the Proposed Project would be designed to conform to County of Los Angeles Fire Department standards for emergency ingress/egress and clearances. The County of Los Angeles Fire Department reviews building plans to conform with these standards as part of the standard building plan approval process. The Project Site is in a fully urbanized portion of the City of Los Angeles and is surrounded by developed land uses, including major roadways, residential neighborhoods, and institutional facilities. The Project Site is not in a very high FHSZ or the WUII It is located approximately 0.45 mile south of a very high FHSZ in an LRA.

Construction

A temporary impact to emergency response and evacuation under the Proposed Project could occur from construction due to temporary lane closures that would potentially alter evacuation routes. Development would be required to comply with the CBC, the CFC, the County Code of Ordinances Sections 503 and 16.06.010, and City of Los Angeles Municipal Code Sections 57.503 and 62.61 (see Section 3.18.1*, Regulatory Framework*). These would be limited to the duration of the construction period, which could include overlapping phases of construction (see Chapter 2, *Project Description,* Section 2.4.8). Additionally, the County of Los Angeles Fire Department and County of Los Angeles Sheriff's Office would review construction staging, traffic control, and permit applications for temporary lane closures as part of building permit issuance to confirm that emergency access and evacuation routes remain operational. Such construction plans would address any overlapping construction activities and the need to maintain access to the Project Site for other ongoing active uses (i.e., hospital uses). Review and approval of temporary

lane closures would ensure that no inconsistencies with emergency evacuation plans would occur.

Further, construction contractors are required by Chapter 33 of the CBC to implement standard fire-safety practices, including maintaining clear access for emergency vehicles, providing on-site fire suppression equipment, and avoiding the accumulation of flammable materials. Adherence to these requirements and applicable regulations would further minimize the potential for construction to exacerbate wildfire risks. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The Project Site is served by the existing roadway network and would not result in substantial changes to the circulation patterns or emergency access routes in the Project area. Rather, the Proposed Project seeks to enhance and improve connectivity within the Project area. Operation of the Proposed Project would not block any roads or evacuation routes and would instead serve to improve circulation and access to the Project Site. The Project Site is not identified as an EOC for the City of Los Angeles; the City's designated EOC is approximately 1.5 miles southwest of the Project Site. The distance between the Project Site and the City's EOC provides a sufficient buffer to ensure that construction or operational activities would not disrupt emergency communications, coordination, or mobilization functions associated with operation of the EOC. Thus, operation of the Proposed Project would not impair the existing EOC because the primary circulation routes serving the EOC would remain operational and unobstructed.

The Proposed Project does not include any features or improvements that would create barriers within the travel network surrounding the Project Site. As a medical campus, clear access is of critical importance within the Project Site; therefore, the Proposed Project would not physically impede travel within or across the Project Site. Thus, the Proposed Project is not anticipated to substantially impair the City's adopted emergency response plan or emergency evacuation plan. The Proposed Project would result in an increase in on-site population of residents and employees; the resulting residential population increase would represent approximately 2 percent of the City's projected residential growth and the employment increase would represent approximately 2 percent of projected employment growth (see Chapter 3.12, *Population and Housing*). This population increase is consistent with the capacity of the existing roadway network and emergency access routes. Population growth would not substantially impede evacuation routes or interfere with adopted emergency response plans or emergency evacuation plans. Moreover, a service loop that would support County of Los Angeles Department of Health Services (DHS) trams, waste, loading, deliveries, and emergency access with minimal public interference would be enhanced. Therefore, Project implementation and compliance with local and State requirements and regulations would ensure that development

of the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Construction

As discussed above, the Project Site is not in the SRA or a very high FHSZ. The nearest lands classified as very high FHSZ are 0.45 mile north of the Project Site. The Project Site is subject to Santa Ana winds in early fall through early spring, which can create dangerous conditions for starting and spreading wildfires during the drier months of the year, and they also spread wildfire smoke hazards, as can prevailing winds. A wildfire combined with Santa Ana winds could expose residents in the area to the uncontrolled spread of wildfire. However, the Project Site is entirely developed and contains various impervious surfaces and buildings and is not prone to wildfire. The Project Site is surrounded by a variety of urban uses, including County of Los Angeles/public uses, residential, commercial, industrial, medical, and institutional uses. Although the Project Site contains an isolated steep vegetated slope west of State Street, the Project Site is not in an area that contains a connected series of steep slopes where high winds can exacerbate wildfire risks or lead to the spread of a wildfire. Construction of the Proposed Project would result in earthmoving activities that would substantially reduce and develop the isolated slope within the Project Site in a way that would further reduce the potential to exacerbate wildfire risks. Development activities for the Proposed Project would be required to comply with the CBC and CFC. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Vegetation can have the potential to exacerbate wildfire risks. However, the Project Site is in an urban and built-out area, and on-site vegetation is ornamental and maintained. Ornamental landscaping consists of irrigated and regularly trimmed plantings rather than dense or unmanaged vegetation, which limits fuel loads and reduces the continuity of combustible materials, which would reduce the potential for fire ignition and the spread of wildfire across the Project Site. Proposed landscaping includes California native drought-tolerant lawn, shrubbery, flowers, or trees, throughout the Project Site which would be continuously maintained. New ground-floor uses facing major circulation routes would include activated, accessible frontages with public areas, shaded seating, and landscape buffers (see Chapter 2, *Project Description*). As described in Section 3.18.1, *Regulatory Framework*, the Safety Elements

of the County and City's General Plans contain several vegetation management, fuel reduction, and fuel break policies and programs to reduce the uncontrolled spread of wildfire due to vegetation in both urban and open space areas. The regulations listed above would serve to reduce wildfire risks associated with vegetation. Implementation of the Proposed Project would increase population, buildings, and infrastructure on-site. The introduction of additional people and human activities (including the use of construction equipment) to fire-prone areas inherently exacerbates existing fire hazards. However, as previously stated, development under the Proposed Project would occur on a site that is already developed and not in a very high FHSZ. Adherence to the above building practices, fire safety regulations, and vegetation fuel management requirements would reduce the potential for exacerbating wildfire risks. Additionally, no wildlands exist within the immediate vicinity of the Project Site. The Proposed Project is not anticipated to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Construction

The Proposed Project would include earthwork, demolition of buildings, new construction, replacement of aging utilities and infrastructure across the Campus. The proposed construction activities would involve trenching, demolition, and the operation of construction equipment. These activities and equipment types could present a temporary fire risk if not properly managed, particularly due to the use of heavy machinery and potential exposure of combustible materials. However, such activities would be regulated under the CBC and CFC, which include requirements for fire-resistant building materials, debris clearance, and fire-safety practices during construction. Compliance with these standards, coupled with the fact that the Project Site is not within or adjacent to a very high FHSZ, would substantially limit the risk of fire ignition associated with construction. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Under the Proposed Project, the Project Site would continue to be served by the Los Angeles Department of Water and Power (LADWP) for electrical services and water services and Southern California Gas Company for natural gas. New infrastructure would be designed to

meet modern safety codes, thereby increasing system reliability under emergency conditions. Development under the Proposed Project would occur on a site that is already developed and not in a very high FHSZ. The Proposed Project would also be subject to fire safety review and oversight by the Los Angeles County Fire Department as part of building permit issuance. These measures, along with the other applicable local and State regulations discussed above, would minimize wildfire risks associated with the installation and maintenance of infrastructure. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Construction

The grading strategy for the Proposed Project would be designed to closely balance the tiered grades of the existing topography, accommodate the needs of the proposed building program, and provide improved circulation and ADA access throughout the Project Site. The Proposed Project includes site grading using excavated fill to reduce slopes along primary streets to less than five percent. Construction activities would occur on a site that is already developed and not in a very high FHSZ. The Project Site is also not within a potential dam inundation area, tsunami inundation area, seiche zone, or landslide/mudslide hazard zone (CGS 2025a; CGS 2025b; DWR 2025; FEMA 2008). Therefore, the Proposed Project's construction activities are not anticipated expose people or structures to significant risks due to post-fire slope instability or drainage changes, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

The County-owned Project Site is in a fully urbanized part of the City of Los Angeles and is surrounded by developed land uses, including major roadways, residential neighborhoods, and institutional facilities. The Campus contains slopes exceeding 10 percent, with elevations in the Campus ranging from approximately 320 feet in the southwest to 450 feet in the northeast. Overland flow within the Project Site is generally from the northeast to the southwest, driven by the natural site topography. The majority of runoff flows toward the historic creek and drains into the existing storm drain that is maintained by the LACFCD. Though there is a steep east-west slope with some vegetation in the center of the Project Site (west of State Street), it is isolated and within the fully developed Campus. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides as result of runoff, post-fire slope instability, or drainage changes. As discussed in

Section 3.6, *Geology and Soils*, of this Draft SEIR, a site investigation did not identify any indications of landsliding, and the Project Site and its immediate vicinity are not mapped in an earthquake-induced landside area. Therefore, there is low risk of landsliding as a result of wildfire. There is no potential for downslope flooding or landslides from any very high FHSZ, as the nearest one is 0.45 miles north of the Project Site. Thus, the Proposed Project is not anticipated to expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, this impact would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.18.5 Cumulative Impact Analysis

The cumulative geographic study area used to assess potential cumulative wildfire impacts is a one-mile radius around the Project Site. This study area was selected because it encompasses the surrounding areas that are both within and outside of a very high FHSZ in an LRA. The one-mile radius does not include any lands in an SRA or WUI. The one-mile radius encompasses the area in which potential changes to wildfire risk, such as ignition potential, evacuation demand, or emergency access, could reasonably overlap or interact with the Proposed Project. Given that wildfire risk in this urbanized setting is highly localized and influenced primarily by site-specific factors such as proximity to wildland fuels, topography, and immediate built conditions, a study area beyond one-mile would not materially change the findings. The one-mile radius includes the following cumulative projects, the 2839 Prewett Project (Cumulative Project 1), 3880 Mission Project (Cumulative Project 2), Boyle Heights Community Plan Update (Cumulative Project 3), Estrella Azul (Cumulative Project 4), USC Discovery and Translation Hub (Cumulative Project 7), Chavez Garden (Cumulative Project 8), 2115-2125 East Cesar Chavez Avenue (Cumulative Project 9), Medical Examiner Crypt Expansion (Cumulative Project 10), Medical Examiner Seismic Retrofit (Cumulative Project 11), Medical Examiner Deferred Maintenance Repair Project (Cumulative Project 12), and RCV Surface Parking Lot (Cumulative Project 13). The cumulative analysis focuses on whether the Proposed Project's incremental contribution to potential wildfire impacts would be cumulatively considerable.

The full list of 13 cumulative projects is provided in Chapter 3, *Environmental Analysis* and illustrated on Figure 3-2, *Cumulative Projects*, of this Draft SEIR.

Would the project have a cumulative effect related to wildfire?

IMPAIR AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, impair an adopted emergency response plan or emergency evacuation during construction. As previously identified, the study area is located in a highly urbanized portion of the City of Los Angeles, where future growth is generally limited to infill redevelopment. The identified cumulative projects consist of small- to moderate-scale development and planning efforts. The Cumulative Projects are located in very high FHSZs and would be subject to building and design standards in the CBC and CFC, including Chapter 7A of the CBC. Additionally, the cumulative projects would be required to be consistent and comply with planning-level emergency response and evacuation documents, including the County of Los Angeles Operational Area Emergency Operations Plan, the City of Los Angeles Base Emergency Operations Plan, the City of Los Angeles General Plan Safety Element, and applicable local hazard mitigation plans, evacuation plans, and emergency response plans, and be subject to review and approval by the LAFD and LAPD.

Similar to the Proposed Project, construction of cumulative development projects would be limited to the duration of the construction period, and direct impacts of construction would be evaluated during the permit review process. Review and approval of temporary lane closures, if needed, for future development projects in the cumulative study area would ensure that no inconsistencies with emergency evacuation plans would occur. The Proposed Project's contribution to cumulative impacts related to emergency response and evacuation would not be cumulatively considerable. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, impair an adopted emergency response plan or emergency evacuation during operation. During operation, the Proposed Project would generate routine activity consistent with existing on-site and surrounding land uses. Emergency access and evacuation routes would remain fully available, and operational activities would be required to comply with all applicable CFC, CBC, and local emergency response and evacuation plan requirements. Therefore, compliance with applicable local and State requirements and regulations would ensure cumulative development would not substantially impair an adopted emergency response plan or emergency evacuation plan. The

Proposed Project's contribution to cumulative impacts related to emergency response and evacuation would not be cumulatively considerable. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

EXACERBATE WILDFIRE RISKS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area , introduce or exacerbate fire risks and could have the potential to contribute to cumulative wildfire risks during construction. Construction activities would not introduce wildland fuels or alter regional fire behavior patterns. The Project Site is located within a highly urbanized area, and cumulative development in the surrounding area consists primarily of urban infill. Because the Proposed Project would not expand into fire-prone landscapes or modify slope or fuel condition, the Proposed Project's construction activities would not contribute to a cumulatively considerable wildfire risk during construction. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, introduce or exacerbate fire risks and could have the potential to contribute to cumulative wildfire risks during operation.

As previously identified, the study area is located in a highly urbanized portion of the City of Los Angeles, where future growth is generally limited to infill redevelopment. The Project Site itself is not within a very high FHSZ or WUI. Additionally, the cumulative study area does not include lands in an SRA or WUI. As discussed above, the Proposed Project would not expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors. Nearby cumulative projects in a very high FHSZ would be subject to the State and local regulations related to wildfire hazard reduction including the CBC, CFC, and LAFD Standards, as well as discretionary review under CEQA. As discussed above, the Proposed Project would not expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

Because cumulative development in this urbanized area would be limited to infill redevelopment and subject to stringent wildfire hazard reduction requirements, the Proposed Project would not combine with cumulative projects to expose project occupants to pollutant

concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors. As such, the Proposed Project would not contribute to a cumulatively considerable wildfire risk during operation. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

INSTALLATION OR MAINTENANCE OF ASSOCIATED INFRASTRUCTURE

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in increased demands on infrastructure such as power lines, roads, and utility corridors, which would the installation or maintenance of infrastructure that could exacerbate wildfire risk during construction. As previously noted, the study area is located in a highly urbanized portion of the City of Los Angeles, where cumulative growth is generally limited to infill redevelopment. Construction of utility connections and infrastructure would occur within an urbanized environment and in compliance with applicable fire code and safety standards. Such activities would not introduce or exacerbate wildfire risk conditions. Other cumulative projects would similarly be required to comply with regulatory requirements. Therefore, the Proposed Project would not contribute to a cumulatively considerable impact during construction. Therefore, cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area, result in increased demands on infrastructure such as power lines, roads, and utility corridors, which would the installation or maintenance of infrastructure that could exacerbate wildfire risk during operation. Nearby cumulative projects would be subject to the same State and local regulations applicable to the Proposed Project. Cumulative projects may have different infrastructure needs and configurations, depending on factors such as site location, land use type, and development intensity. These infrastructure needs, such as water supply for fire suppression, access roads, and utility layouts, would be evaluated on an individual basis during the project-specific planning and discretionary review processes.

As discussed above, any development in very high FHSZs, SRAs, and/or the WUI, would be required to comply with applicable building and design standards in the CBC and CFC, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. New infrastructure would be designed to meet modern safety codes, thereby increasing system reliability under emergency conditions. The Proposed Project would also be subject to fire safety review and oversight by

the Los Angeles County Fire Department as part of building permit issuance. These measures, along with the other applicable State regulations, would minimize wildfire risks associated with the installation and maintenance of infrastructure. Cumulative wildfire impacts are generally associated with development in fire-prone landscapes that increases fuel continuity or impairs evacuation infrastructure. The Proposed Project and reasonably foreseeable development in the surrounding urban core would not alter regional wildfire risk conditions or evacuation planning. Because cumulative development within the study area would be limited to infill redevelopment and required to comply with applicable fire safety regulations, and the Proposed Project's contribution to cumulative wildfire risk associated with infrastructure would not be cumulatively considerable, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

LANDSLIDE AND FLOODING RISKS

Construction

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area expose people or structures to risks associated with post-fire slope instability or drainage change during construction. The surrounding area of the Project Site is fully developed and is not in proximity to steep slopes, natural drainage courses, dams, or large bodies of water. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides as result of runoff, post-fire slope instability, or drainage changes, as those attributes are not present. Construction activities would not affect regional slope condition. As such, cumulative development in the study area, which is generally limited to infill redevelopment within a highly urbanized portion of the City of Los Angeles, is unlikely to result in substantial downslope or downstream post-fire flooding or landslide hazards. As with the Proposed Project, other nearby cumulative projects would be subject to the same State and local regulations related to wildfire hazard reduction and would be required to undergo discretionary and CEQA review. As discussed in Chapter 3.6, *Geology and Soils*, of this Draft SEIR, cumulative impacts related to landslides were found to be less than significant. Therefore, there is low risk of landsliding as a result of wildfire. There is no potential for downslope flooding or landslides from any very high FHSZ, as the nearest one is 0.45 miles north of the Project Site. Similarly, as discussed in Chapter 3.9, *Hydrology and Water Quality*, of this Draft SEIR, cumulative impacts related to flooding were found to be less than significant.

Because the Proposed Project and other cumulative development project would occur within a developed, urbanized area with minimal topographical relief and would comply with applicable hazard mitigation and building requirements, the Proposed Project's contribution to cumulative post-fire flooding or landslide hazards would not be cumulatively considerable. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

Operation

Cumulative impacts would occur if the Proposed Project, together with other past, present, and reasonably foreseeable projects in the cumulative geographic study area expose people or structures to risks associated with post-fire slope instability or drainage change during operation. During operation, the Proposed Project would not alter topographic conditions in a manner that would increase susceptibility to post-fire slope instability. Given the urban setting and absence of adjacent wildland areas, cumulative development would not result in significant post-fire geologic hazards. The Proposed Project's contribution to cumulative post-fire flooding or landslide hazards would not be cumulatively considerable. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant. No mitigation is necessary.

3.18.6 Comparison to the 2014 Master Plan EIR Analysis

The 2014 Master Plan EIR did not separately analyze the topic of wildfire. Impacts related to fire hazards were addressed in the Hazards and Hazardous Materials and the Utilities and Service Systems sections, and the NOP/IS prepared for the 2014 Master Plan EIR determined that no impacts would occur related to wildland fire. The 2014 Master Plan EIR determined that the proposed new buildings would be designed to conform to County of Los Angeles Fire Department standards for emergency ingress/egress and clearances, and impacts related to wildfire and emergency response would be less than significant. As described in Section 3.18.4, *Project Impact Analysis*, and 3.18.5, *Cumulative Impact Analysis*, the Proposed Project would result in less-than-significant impacts to the impairment of an adopted emergency response plan or emergency evacuation plan, exacerbation wildfire risks due to slope, prevailing winds, and installation or maintenance of infrastructure, and downslope or downstream flooding or landslides.

No mitigation measures related to wildfire were outlined in the 2014 Master Plan EIR. As identified, the Proposed Project would not require mitigation measures to reduce impacts related to wildfire.

3.18.7 References

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4. ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of a reasonable range of project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to State CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing significant adverse environmental effects as compared to the proposed project. It also describes other alternatives that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. Finally, as required under State CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, "Consideration and Discussion of Alternatives to the Proposed Project," of the State CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly

disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (Section 15126.6[a])

4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the Proposed Project.

4.2.1 Project Objectives

Chapter 2, Section 2.3, *Statement of Project Objectives*, lists the objectives that have been established for the Proposed Project and will aid decision makers in their review of the Proposed Project, the Proposed Project alternatives, and associated environmental impacts. For purposes of analysis within this chapter, the Proposed Project's objectives are numbered and restated here:

HEALTHCARE, PUBLIC HEALTH, AND WHOLE-PERSON WELLNESS

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

HOUSING AND ECONOMIC OPPORTUNITY

3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, to address housing needs of the County and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.

6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.

CIRCULATION, ACCESS, AND OPEN SPACE

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

INFRASTRUCTURE, SUSTAINABILITY, AND RESILIENCE

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

4.2.2 Significant Unavoidable Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated for their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. The Proposed Project would result in significant and unavoidable impacts related to air quality, cultural resources, greenhouse gas (GHG) emissions, noise, recreation, and transportation.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts of the Proposed Project would result in significant and unavoidable impacts even with implementation of mitigation measures, as reflected in the analysis in the EIR.

- **Impact AIR-2:** Operation activities related to the Proposed Project have the potential to result in regional emission impacts. Due to the overall development intensity proposed, Project operations would generate maximum daily emissions that exceed the South Coast Air Quality Management District (AQMD) regional emissions thresholds for volatile organic compounds (VOC), nitric oxide (NO_X), carbon monoxide (CO), Particulate Matter greater

than or equal to 10 micrometers (PM_{10}), and Particulate Matter less than or equal to 2.5 micrometers ($PM_{2.5}$) even with implementation of Mitigation Measures GHG-1a through GHG-1c and TRA-3d. Thus, impacts are considered to be significant and unavoidable.

- **Impact AIR-4:** Operation of warehousing and industrial uses accommodated under the Proposed Project has the potential to result in localized criteria air pollutant emissions impacts. These land use types could include non-stationary sources of emissions (e.g., heavy-duty trucks and off-road equipment) that could generate on-site emissions. Implementation of Mitigation Measures AIR-4a through 4c would reduce on-site emissions to the extent feasible. However, due to the programmatic nature of the Proposed Project, the amount of operation-related on-site criteria air pollutant emissions generated cannot be determined, and it is unknown whether the Proposed Project could result in generating operation-related on-site criteria air pollutant emissions that would exceed the South Coast AQMD localized significance thresholds. Thus, impacts are considered to be significant and unavoidable.
- **Impact AIR-5:** Operation of warehousing and industrial uses accommodated under the Proposed Project has the potential to result in localized toxic air contaminant (TAC) emissions impacts. These land use types could include non-stationary sources of TAC emissions (e.g., heavy-duty trucks and off-road equipment) that could generate on-site emissions. Implementation of Mitigation Measure AIR-5 would reduce on-site emissions to the extent feasible. However, due to the programmatic nature of the Proposed Project, it cannot be determined, and it is unknown whether the Proposed Project could result in generating operation-related on-site TAC emissions resulting in health risk levels that would exceed the South Coast AQMD health risk significance thresholds. Thus, impacts are considered to be significant and unavoidable.
- **Impact AIR-8**: The Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to air quality during operation. Under South Coast AQMD methodology, project-level impacts also represent cumulative impacts. Because the Proposed Project would result in project-level emissions impacts with implementation of Mitigation Measures AIR-4a through 4c, Mitigation Measures GHG-1a through GHG-1c, and Mitigation Measure TRA-3d, the Proposed Project would result in a contribution to this cumulative impact and impacts would be cumulatively considerable. In addition, Impact AIR-8 would only require implementation of the mitigation measures identified to address project-level impacts. Thus, cumulative impacts are considered to be significant and unavoidable.
- **Impact CUL-1:** Construction activities and the introduction of new development resulting from implementation of the Proposed Project's has the potential to result in substantial direct adverse changes to existing historical resources to remain (the Old Administration Building, Los Angeles General Hospital–Acute Unit Building, and Los Angeles General Hospital–Acute Unit Historic District)Incorporation of Project Design Features (PDF) 1 through 5 as part of the Proposed Project would ensure that all work within the boundaries

of the Los Angeles General Hospital –Acute Unit Historic District would be compliant with the elements of the Secretary of Interior Standards for Treatment of Historic Properties (Standards); thus, no direct impacts to the Los Angeles General Hospital–Acute Unit Historic District, including the Los Angeles General Hospital–Acute Unit Building, would occur. The Proposed Project would also include the implementation Mitigation Measures CUL-1a through CUL-1c to reduce impacts on historical resources to the extent feasible; however, given designs for future potential projects are not known at this time, and may not meet all elements of the Standards, new construction activities could result in significant and unavoidable impacts to historical resources. Thus, impacts are considered significant and unavoidable.

- **Impact CUL-3:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to historical resources during construction. Construction activities associated with the Proposed Project have the potential to result in adverse changes to existing historical resources. With the incorporation of PDFs 1 through 5 and implementation of Mitigation Measures CUL-1a through CUL-1c, impacts would be reduced to the extent feasible; however, given designs for future projects are not known at this time, and may not meet all elements of the Standards, impacts have the potential to contribute to a cumulative impact and impacts would be cumulatively considerable. Thus, cumulative impacts are considered to be significant and unavoidable.
- **Impact GHG-1:** The Proposed Project's construction and operational activities have the potential to result in annual GHG emissions that exceed the South Coast AQMD bright-line GHG significance threshold. Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d would contribute to reducing Project GHG emissions to the extent feasible. However, because the specifics of the potential future development projects accommodated under the Proposed Project are not known at this time, Project-related emissions could still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/yr. Thus, impacts are considered to be significant and unavoidable.
- **Impact GHG-2:** Construction and operation of the Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to GHG emissions. The Proposed Project has the potential to result in GHG emissions impacts, which is by its nature cumulative impact. Implementation of Mitigation Measure GHG-1a through 1e and Mitigation Measure TRA-3d would reduce Proposed Project emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term GHG emissions generated from the Proposed Project could still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/yr. The Proposed Project would result in a contribution to this cumulative impact and impacts would be cumulatively considerable. Thus, cumulative impacts are considered significant and unavoidable.

- **Impact NOI-1:** The Proposed Project has the potential to result in temporary noise increases in excess of applicable standards during construction activities. Construction activities, including pile driving, associated with the Proposed project would generate noise levels that could exceed applicable construction noise thresholds at nearby receptors (off- and on-site receptors). While the implementation of Mitigation Measure NOI-1 would reduce construction noise levels, certain-construction activities, including potential pile-driving, could still result in noise levels that exceed applicable thresholds. Because the potential for pile-driving exists and construction noise impacts cannot be reduced to a less-than-significant level with mitigation, impacts would be significant and unavoidable.
- **Impact NOI-2**: The Proposed Project's operational traffic has the potential to result in a substantial increase in ambient noise levels, specifically, along the segment of Marengo Street between Lord Street and State Street. The Proposed Project is anticipated to result in a 3 dBA CNEL noise increase in an ambient environment of 65 dBA or greater. No feasible mitigation measures have been identified that would reduce the Proposed Project's operational traffic noise. Impacts would be significant and unavoidable.
- **Impact NOI-4:** The Proposed Project's construction activities have the potential to result in groundborne vibration or noise in excess of applicable standards. The proposed heavy construction equipment would generate a maximum groundborne vibration level of 0.13 PPV at 130 feet. As it relates to vibration impacts to historic structures, Mitigation Measure CUL-1c shall be implemented, which would ensure no indirect structural damage would occur. While the implementation of Mitigation Measure NOI-4 and Mitigation Measures CUL-1c would reduce construction vibration levels, Mitigation Measure NOI-4 and Mitigation Measure CUL-1c would not reduce construction vibration impacts to a less that significant level. Impacts would be significant and unavoidable.
- **Impact NOI-5:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to construction-related noise. Mitigation Measure NOI-1 would be implemented to reduce construction noise levels; however, certain-construction activities, including pile-driving, could still result in noise levels that exceed applicable thresholds. Because construction impacts for noise from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. Other reasonably foreseeable cumulative projects in the area could increase ambient construction noise levels. Thus, cumulative impacts are considered to be significant and unavoidable.
- **Impact NOI-6**: The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to operational traffic-related noise. The Proposed Project's operational traffic has the potential to result in a substantial increase in ambient noise levels, specifically, along the segment of Marengo Street between Lord Street and State Street. The Proposed Project is anticipated to result in a 3 dBA CNEL noise increase in an ambient environment of 65 dBA

or greater. Traffic generated by other cumulative development in the area would also contribute to ambient traffic noise levels. Because the Proposed Project's incremental traffic noise increase would be perceptible and would occur in an area where ambient noise levels already exceed applicable thresholds, the Proposed Project's contribution to cumulative traffic noise impacts is considered cumulatively considerable. Thus, cumulative Impacts would be significant and unavoidable.

- **Impact NOI-7:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to construction-related vibration. The Proposed Project's construction activities would result in cumulative impacts related to the generation of groundborne vibration or noise in excess of applicable standards if pile driving activities occur. While the implementation of Mitigation Measure NOI-4 and Mitigation Measures CUL-1c would reduce construction vibration levels, Mitigation Measure NOI-4 and Mitigation Measure CUL-1c would not reduce construction noise impacts to a less that significant level. Because construction impacts from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. Other reasonable foreseeable construction in the area could increase ambient construction noise levels. Thus, cumulative impacts would be significant and unavoidable.
- **Impact REC-1:** Construction activities associated with the Proposed Project, including the Proposed Project's on-site recreational facilities, would have the potential to result in adverse effect on air quality, noise, and traffic. The Proposed Project would incorporate Mitigation Measures AIR-1a through AIR-1b, NOI-1, and NOI-4. The Proposed Project would result in significant and unavoidable construction-related effects on the environment with respect to noise, which cannot be fully mitigated, as detailed in that technical analysis. Thus, impacts to recreational facilities are considered to be significant and unavoidable.
- **Impact REC-2:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to construction of recreational facilities. Because the Proposed Project's impacts related to construction activities are significant at the project-level, the Proposed Project's contribution to cumulative construction impacts I considered to be cumulatively considerable. Mitigation Measures AIR-1a through AIR-1b, NOI-1 and NOI-4, and TRA-1 would reduce impacts to the extent feasible; however, impacts would not be reduced to a less than significant level. Thus, cumulative impacts to recreational facilities would be significant and unavoidable.
- **Impact TRA-3:** The Proposed Project would result in potential off-ramp queuing safety issues at four locations, specifically the I-5 Southbound Off-Ramp to Mission Road, the I-10 Westbound Off-Ramp to State Street, the I-5 Northbound Off-Ramp to Cesar Chavez Avenue, and the I-10 Westbound Off-Ramp to Soto Street. While implementation of Mitigation Measures TRA-3a through TRA-3d would reduce off-ramp queuing impacts at all locations; however, only the I-10 off-ramp to Soto Street would potentially operate within lane storage

limits during both peak hours after mitigation. Thus, impacts cannot be reduced to a less-than-significant level. Thus, impacts would be significant and unavoidable.

- **Impact TRA-5:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to transportation hazards. Because the Proposed Project's operational traffic impacts are significant at the project-level, the Proposed Project's contribution to cumulative transportation hazards is considered cumulatively considerable. While implementation of Mitigation Measures TRA-3a through TRA-3d would reduce impacts, these mitigation measures would not reduce transportation hazards impacts to a less than significant level. Thus, cumulative impacts would be significant and unavoidable.
- **Impact USS-1:** The Proposed Project's operational activities would result in potential water supply impacts for projects constructed after 2045. The Proposed Project assumes a phased long-term 25-year development horizon. The current 2020 UWMP projects water supplies based on population projections through 2045. The next UWMP will project water supplies through 2050. As such, it is not known whether sufficient water supplies and entitlements would exist to accommodate those projects' water demand. While implementation of Mitigation Measure USS-1 would require the County to assess the availability of water supplies to accommodate future development with the Project Site that would be implemented beyond the year 2045, it may be determined that water supplies would not be sufficient to meet future water demands. Thus, impacts are considered to be significant and unavoidable.
- **Impact USS-2:** The Proposed Project's operational activities have the potential to result in the generation of wastewater that exceeds the capacity at existing wastewater facilities. While implementation of Mitigation Measure USS-2 would reduce sewer system capacity impacts, Mitigation Measure USS-2 would not reduce impacts to a less than significant level due to uncertainty regarding existing sewer system capacity and the extent, timing, and funding of future local utility infrastructure remains. Thus, impacts are considered to be significant and unavoidable.
- **Impact USS-3:** The Proposed Project's operational water demand impacts are significant; therefore, the Proposed Project's contribution to cumulative water demand impacts is considered cumulatively considerable. While implementation of Mitigation Measure USS-1 would reduce impacts, it would not reduce water demand impacts to a less than significant level. Thus, impacts are considered to be significant and unavoidable.
- **Impact USS-4:** The Proposed Project's operational wastewater impacts are significant; therefore, the Proposed Project's contribution to cumulative wastewater impacts is considered cumulatively considerable. While implementation of Mitigation Measure USS-2 would reduce impacts, it would not reduce wastewater impacts to a less than significant level. Thus, impacts are considered to be significant and unavoidable.

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

State CEQA Guidelines Section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. State CEQA Guidelines Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

4.3.1 No Project/No Redevelopment Alternative

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

of historic resources may result in the gradual loss of historic integrity, which could represent an adverse outcome for cultural resources. Therefore, the County finds that the No Project/Business as Usual Alternative is not feasible.

While the No Project/No Redevelopment Alternative would avoid many of the environmental impacts associated with redevelopment of the Campus, CEQA requires that alternatives be capable of feasibly attaining most of the basic objectives of the Proposed Project. Because this alternative would not implement the Campus modernization or long-term planning framework contemplated by the Proposed Project, it would not feasibly attain most of the Proposed Project's fundamental objectives.

4.3.2 Alternate Site Alternative

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

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

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

The Proposed Project is intended to occur within the existing Campus and involves redevelopment and integration of multiple facilities, including existing buildings and new development that support institutional, residential, and supporting uses. As a result, implementation of the Proposed Project requires a site of sufficient size to accommodate these uses within an integrated campus environment and to allow coordination with existing facilities,

infrastructure, and circulation systems. Many potential sites within the surrounding urbanized area would not provide the necessary size or configuration to support this type of integrated campus development.

In order to achieve an integrated Campus environment, the Alternate Site must be comprised of parcels or areas that are contiguous or immediately proximate to each other, of adequate size, within the City of Los Angeles, and owned by the County and capable of functioning as part of a coordinated campus. The existing Los Angeles County General Hospital Campus, consists of multiple parcels located in proximity to one another, including parcels separated by public streets such as Marengo Street, Zonal Avenue, and Mission Road, but operate collectively as a single Campus. Any alternate location must contain enough available space for infill development and not otherwise jeopardize County operational needs and functions.

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

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

Because the Proposed Project's objectives are centered on redevelopment and modernization of the existing Campus, including adaptive reuse of existing facilities and implementation of a coordinated Campus planning framework, development at an alternate location would not feasibly attain most of the fundamental objectives of the Proposed Project. Additionally, of the Proposed Project's objectives is intended to provide uses that do not exist at the Project Site,

which include commercial, residential, and educational uses. Moreover, the Project Site is strategically located within an established urban area of the City of Los Angeles that is well served by public transit and proximate to the populations and communities the facilities is intended to serve. Because the Project Site is already developed and contains existing structures, infrastructure, and disturbance areas that support the existing operation of the Campus, redevelopment on the Project Site allows the County to build upon an established medical campus. While alternate locations could be identified within urbanized areas, such site may not provide the same existing infrastructure or operational integration as the project Site and could require additional site assembly, redevelopment, or land use transitions to accommodate the Proposed project. Alternative locations may not provide comparable accessibility to transit connectivity. Additionally, this alternative would not meet the Proposed Project's objectives relating to economic development because the County-owned site is currently underutilized. Moreover, this alternative would not include the preservation or protection of historic resources on-site.

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

4.3.3 Phased/Delayed Alternative

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

Accordingly, while delayed implementation could potentially allow the Project to benefit from future technological or regulatory improvements, these potential benefits are speculative and

cannot be relied upon to substantially lessen the significant environmental impacts identified for the Proposed Project.

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

Initial phases would focus on modernization, renovation, and lower-intensity improvements that generate fewer emissions and result in reduced environmental effects in the near term. However, this reduction would be temporary and limited to early construction phases. Under this alternative, the same overall development program would ultimately be implemented, and subsequent construction phases would generate emissions, noise, and other environmental effects similar in intensity and duration to those identified for the Proposed Project.

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

4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project.

- Alternative A: No Project/2014 Master Plan Development
- Alternative B: General Hospital Adaptive Reuse
- Alternative C: Reduced Density Medical Campus Alternative

Table 4-1 Summary of Alternatives

Feature	Proposed Project	Alternative A	Alternative B	Alternative C
Overall Development Program	Implementation of the General Hospital Campus Master Plan, including redevelopment and modernization of the Campus. Introduction of new land uses to the Campus to create a mixed-use community.	Implementation of the remaining components of the previously approved 2014 Master Plan.	Adaptive reuse of the General Hospital Building with a mix of uses including residential, commercial, and office uses.	Redevelopment within the western portion of the Campus with medical related uses.
Approximate Development Intensity	Total buildout of approximately 8,061,000 new square feet	Total buildout of approximately 1,227,400 new square feet and 450-bed hospital	Adaptive reuse of the approximately 1.2 million square foot General Hospital Building	Introduction of approximately 1,295,300 square feet of new construction.
Adaptive Reuse of the General Hospital Building?	Yes	No	Yes	No
Campus Modernization?	Yes	Yes	No	Yes

The mitigation measures identified for the Proposed Project would also be applicable to the alternatives analyzed in this Draft SEIR, as applicable. Because the alternatives would generally result in similar or reduced environmental impacts compared to the Proposed Project, no additional feasible mitigation measures beyond those identified for the Proposed Project have been identified for the alternatives.

Additionally, similar to the Proposed Project, the alternatives evaluated in this Draft SEIR would contribute to cumulative impacts associated with regional development. However, because the alternatives would generally involve reduced development intensity and smaller areas of disturbance compared to the Proposed Project, their incremental contributions to cumulative impacts would be similar to or reduced compared to those identified for the Proposed Project. None of the alternatives would result in new cumulatively considerable impacts beyond those identified for the Proposed Project.

4.5 ALTERNATIVE A: NO PROJECT/2014 MASTER PLAN DEVELOPMENT

According to Section 15156.6(e) of the State CEQA Guidelines, a "no project" alternative shall be evaluated to allow decisionmakers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. Additionally, the no project alternative may represent the continuation of an existing land use or ongoing operation into the future. Thus, the no project alternative represents a continuation of redevelopment uses identified in the previously approved 2014 Master Plan, which was analyzed in the 2014 Master Plan EIR, subsequent addenda, and exemption (see Chapter 1, *Introduction*, for details on prior approvals).

Under the No Project/2014 Master Plan Development (Alternative A), the Proposed Project would not be implemented and the approved 2014 Master Plan would allow for continued operation and incremental modernization of the Medical Center Campus, allowing for renovation, replacement, and expansion of existing buildings and utility infrastructure as needed to support ongoing medical, administrative, and supportive functions. Alternative A would also result in an enhanced connection between the east and west portions of the Project Site. No new comprehensive redevelopment or reconfiguration of the Campus would occur beyond what is currently approved. This alternative would allow for approximately 827,801 square feet of demolition and approximately 1,157,070 square feet of new construction[1]—including a proposed 450-bed hospital (400,000 square feet) on the Project Site—consistent with the approved 2014 Master Plan framework.[2] No adaptive reuse of the General Hospital Building would occur.

The Project Site would, therefore, remain developed consistent with prior County approvals, and future improvements would continue to occur in response to operational needs and

[1] The 2014 Master Plan proposed 1,245,000 square feet of new development; the 2017 Project proposed a reduction of 127,000 square feet of Research and Development and a new 70,342 square foot Residential Care Facility, which would result in 1,188,342 square feet of new development; the 2023 Project proposed a reduction of 50,000 square feet of Administrative Office, a new 15,770 square foot medical office (land swap with Research and Development and Office Use), 115,420 square foot hospital addition (land swap with Research and Development and Office), and 17,880 square foot Residential Care Facility, which would result in 1,227,412 square feet of new development. Since the certification of the 2014 Master Plan EIR, Phase I of the RCV has been completed (70,342 square feet). Under the 2014 Master Plan, there is a remaining 1,157,070 square feet of new development.

[2] The 2014 Master Plan EIR evaluated 1,217,800 SF of demolition and 1,227,400 SF of new construction. Since the County's approval, demolition of the Woman's and Children's Hospital occurred, and construction of the Restorative Care Village is underway. The numbers presented herein as part of Alternative A reflect the remaining available demolition and new construction amounts under the 2014 Master Plan as amended by the addenda.

regulatory requirements, as determined by the County. Overall, Alternative A would result in an approximately 83 percent[3] reduction in development buildout when compared to the Proposed Project. Alternative A would result in less demolition and less new development.

4.5.1 Aesthetics

Under this alternative, future development pursuant to the 2014 Master Plan framework would occur on the Project Site. As analyzed in the 2014 Master Plan EIR, the 2014 Master Plan would result in significant and unavoidable aesthetics impacts related to the demolition of the buildings at the Women's and Children's Hospital Site because these buildings were determined to be historical resources. The buildings at the Women's and Children's Hospital Site were demolished in 2021; therefore, this impact has already occurred and is no longer relevant. Construction activities under this alternative would involve demolition, grading, and building construction similar to the Proposed Project. These activities would require temporary lighting for safety and security purposes and could introduce sources of glare from construction equipment and materials. As with the Proposed Project, such effects would be temporary, intermittent, and limited to the duration of construction activities.

This alternative would occur within the same boundaries analyzed in the 2014 Master Plan EIR and under the Proposed Project. The Project Site is not located within a State scenic highway and the Project Site is not a part of a scenic vista. The nearest designated scenic highway is the Arroyo Seco Federal Byway. However, the Project Site is not visible from most vantage points along the byway, and only limited views of the upper portions of the General Hospital Building may be visible from select locations. This alternative would not adversely affect scenic resources or views from the Arroyo Seco Federal Byway.

Construction and operation of the remaining planned development of the 2014 Master Plan would not have an adverse impact on scenic vistas, light and glare, or shade/shadow.

At buildout, this alternative would introduce new sources of exterior lighting associated with buildings, parking areas, and circulation infrastructure, as well as potential glare from architectural materials such as glass and metal surfaces. Additionally, new sources of shade/shadow could be introduced. Because this alternative assumes redevelopment of the campus consistent with the overall scale and intensity of development envisioned under the 2014 Master Plan, operational lighting/glare and shade/shadow conditions would be generally similar to those of the Proposed Project. While design features and site layout may vary, the extent of nighttime illumination and potential for glare would not be substantially reduced compared to the Proposed Project.

[3] ([6,833,578 – 1,157,070]/6,833,578) x 100 = ~83%

Under Alternative A, the Project Site's visual character would be modified through the remaining demolition and construction anticipated in the 2014 Master Plan; however, demolition activities would be less than the Proposed Project. Similarly, new construction would be substantially less than the amount anticipated under the Proposed Project. The General Hospital Building would continue to remain mostly vacant. Stabilization could occur pursuant to prior approvals; however, no reuse or occupation of the building would occur.

Because this alternative would not increase the redevelopment activities on the Project Site in comparison to the Proposed Project, fewer visual changes would occur and, thus, no new aesthetic impacts would occur beyond those identified for the Proposed Project. Impacts would be less than significant, similar to the Proposed Project; however, this alternative would result in reduced impacts compared to the Proposed Project.

4.5.2 Air Quality

As previously described, under Alternative A, construction activities would be less than the Proposed Project, with less demolition and an 85 percent reduction in new development occurring on the Project Site when compared to the Proposed Project. Because the overall scale of development would be less than the Proposed Project, this alternative would require fewer construction activities and equipment operating concurrently on a daily basis, resulting in reduced peak daily construction emissions, including nitrogen oxides (NO_X), volatile organic compounds (VOCs), and particulate matter, when compared to the Proposed Project.

Construction emissions under Alternative A would be subject to the mitigation measures identified in the 2014 Master Plan EIR. These measures require the use of properly maintained construction equipment, compliance with applicable emissions standards, and implementation of fugitive dust control practices, such as watering exposed soils and stabilizing disturbed surfaces to minimize particulate matter emissions. Additional measures require limiting unnecessary equipment idling and complying with applicable South Coast Air Quality Management District (SCAQMD) rules and regulations intended to reduce construction-related emissions. Implementation of these measures would minimize emissions of NOx, VOC, and particulate matter to the extent feasible. Therefore, construction-related emissions would be less when compared to the Proposed Project. Despite implementation of these mitigation measures, construction activities under Alternative A would continue to generate regional emissions that exceed applicable SCAQMD thresholds, similar to the Proposed Project.

In addition, operational emissions under Alternative A would be less than the Proposed Project given the lower intensity of land uses, and this alternative would avoid the Proposed Project's significant and unavoidable impacts related to operational air quality impacts. During operation, the Proposed Project would exceed the threshold for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ and would

require the implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d.

Overall, Alternative A would result in diminished air quality impacts compared to the Proposed Project but would not avoid the significant and unavoidable construction-related air quality impacts identified for the Proposed Project.

4.5.3 Biological Resources

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, which includes demolition of buildings and potential tree removals. As discussed throughout this Draft SEIR, the Project Site is fully developed with buildings, paved areas, utilities, and infrastructure associated with the Campus. As documented in this Draft SEIR, the Project Site does not support sensitive vegetation communities, special-status plant or wildlife species, wetlands, or other jurisdictional features. Biological resources within the Project Site are limited to ornamental landscaping, scattered trees, and urban-tolerant wildlife typical of a heavily developed institutional campus. Similar to the Proposed Project, Alternative A would potentially impact nesting birds during construction as birds would potentially nest on the Project Site during the nesting season including within trees, shrubs, on or in buildings, on the ground concealed in herbaceous/low-lying vegetation and other suitable nesting features and would be subject to existing regulations and mitigation measures identified in the 2014 Master Plan EIR, which requires that vegetation removal, demolition, and other noise-generating construction activities occur outside the nesting bird season, where feasible, or be preceded by preconstruction nesting bird surveys conducted by a qualified biologist. If active nests are identified, appropriate buffer zones must be established and maintained until nesting activity has concluded, in accordance with applicable federal and State regulations protecting nesting birds.

Similar to the Proposed Project, implementation of Alternative A would be required to comply with applicable federal, State, and local policies and ordinances intended to protect biological resources, including regulations protecting nesting birds and bats, and requirements governing tree removal.

Therefore, biological resources impacts resulting from Alternative A would be less than significant with mitigation, which would be consistent with the Proposed Project. This alternative would result in similar impacts compared to the Proposed Project.

4.5.4 Cultural Resources

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site. Alternative A would result in the demolition of existing structures and

buildings identified for demolition in the 2014 Master Plan EIR. Given the substantial reduction in new development under Alternative A, impacts associated with incompatibility and construction vibration are considered to be reduced from the Proposed Project. However, similar to the Proposed Project, the ultimate location and massing of potential structures in relation to existing historic buildings to remain (i.e., the Old Administration Building, Los Angeles General Hospital–Acute Building and historic district) is unknown. Therefore, significant and unavoidable impacts to historical resources, while reduced, would remain. Under Alternative A, there would be no adaptive reuse of the General Hospital Building, which could lead to future degradation and deterioration, impacting its ability to retain its historic integrity and importance. Thus, impacts to historical resources under this alternative have the potential to be greater compared to the Proposed Project.

Similar to the Proposed Project though at a reduced intensity, ground-disturbing activities would occur that could impact archaeological resources, and mitigation measures from the 2014 Master Plan EIR would be required to reduce potential impacts to less than significant. Like the Proposed Project, construction activities under Alternative A would also include grading and excavation activities that could affect unknown buried archaeological resources and disturbance or destruction of these resources resulting in a substantial adverse change would be significant. Additionally, standard procedures, including adherence to the California Health and Safety Code Section 7050.5 and mitigation, would be applied to avoid impacts from inadvertent discoveries of human remains. As under the Proposed Project, impacts would be less than significant with implementation of mitigation. Specifically, Alternative A would implement Mitigation Measure MM-CR-8 from the 2014 Master Plan EIR, which requires that a qualified archaeologist review grading and excavation plans to identify areas with potential archaeological sensitivity and conduct monitoring during initial ground-disturbing activities, as appropriate. If cultural resources are discovered during construction, work must stop in the vicinity of the find and appropriate treatment measures, such as avoidance, capping, or data recovery, must be implemented under the direction of a qualified archaeologist. This alternative would result in similar archaeological impacts compared to the Proposed Project.

4.5.5 Energy

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site. Alternative A would result in less energy consumption compared to the Proposed Project due to its substantially smaller development program and lower overall intensity. While construction and operation of new hospital facilities would increase energy demand relative to existing conditions, this alternative would be less in comparison to the Proposed Project's energy usage. However, compliance with current energy efficiency standards would ensure that energy impacts remain less than significant, similar to the Proposed Project.

4.5.6 Geology and Soils

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site at a reduced intensity than under the Proposed Project. The entire Project Site has been subject to previous disturbance and development. Similar to the Proposed Project, Alternative A would be subject to standard engineering practices and existing regulations.

Under this alternative, activities previously approved under the 2014 Master Plan, including refinements analyzed under subsequent addenda, would occur. Specifically, clean out, remediation, selective demolition, and targeted structural strengthening and seismic retrofit of the General Hospital Building to improve its structural integrity and seismic performance. However, under Alternative A, the full adaptive reuse and additional seismic retrofit components proposed under the Proposed Project would not occur. As a result, while structural conditions would be improved under Alternative A relative to existing conditions, this alternative would not achieve the same level of long-term structural safety improvement associated with the completion of the Proposed Project.

Overall, the geology and soils impacts resulting from Alternative A would be less than significant with mitigation identified in the 2014 Master Plan EIR, which would be consistent with the Proposed Project. Mitigation measures identified in the 2014 Master Plan EIR require that site-specific geotechnical investigations be conducted for individual development projects and that all grading and construction activities comply with the recommendations of qualified geotechnical professionals. These measures include incorporation of seismic design standards, evaluation of soil stability and settlement potential, preparation of grading plans, and construction monitoring to ensure proper implementation of geotechnical recommendations and compliance with applicable building codes. This alternative would result in similar impacts compared to the Proposed Project; however, the Proposed Project would provide greater seismic safety improvements through completion of the adaptive reuse and full retrofit program.

4.5.7 Greenhouse Gas Emissions

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, which is an approximate 85 percent reduction from what is included under the Proposed Project. This alternative would implement applicable mitigation measures from the 2014 Master Plan EIR to reduce impacts related to GHG emissions, though impacts were assumed to be significant and unavoidable because GHG emissions would exceed the 3,000 metric tons of CO_2 threshold with the implementation of mitigation. Mitigation measures identified in the 2014 Master Plan EIR for GHG emissions require incorporation of energy-efficient design features and sustainable building practices into individual development

projects. These measures include compliance with applicable energy efficiency standards, incorporation of energy- and water-conserving technologies, and implementation of design strategies that reduce long-term operational greenhouse gas emissions. Implementation of these measures would reduce greenhouse gas emissions associated with building operations and support consistency with applicable greenhouse gas reduction goals. Although this alternative would not avoid the Proposed Project's significant and unavoidable impacts related to GHG emissions, this alternative would result in less GHG emissions compared to the Proposed Project due to the lower overall building square footage and reduced operational activity levels. Because GHG emissions are closely tied to building energy consumption, vehicle trips, and overall operational demand, the reduced scale of development under Alternative A would result in lower operational energy use and fewer vehicle trips compared to the Proposed Project.

Additionally, construction activities under Alternative A would involve less demolition and new building construction than the Proposed Project, resulting in reduced construction-related GHG emissions. Although Alternative A would still generate GHG emissions associated with long-term Campus operations, the reduced development intensity would result in lower overall GHG emissions compared to the Proposed Project.

4.5.8 Hazards and Hazardous Materials

Alternative A would result in the demolition of existing structures as previously approved; however, at a reduced volume compared to the Proposed Project. Although this alternative would result in the demolition of fewer buildings, like the Proposed Project, the alternative would result in the demolition of buildings that have the potential to contain hazardous materials such as asbestos containing materials (ACMs) and lead-based paint (LBP), and subsurface hazardous materials could be encountered. As with the Proposed Project, this alternative would also be required to comply with current regulations and requirements. Therefore, the hazards and hazardous materials impacts resulting from this alternative would be less than significant with mitigation identified in the 2014 Master Plan EIR, which would be similar to the Proposed Project. Mitigation measures identified in the 2014 Master Plan EIR for hazards and hazardous materials require evaluation and removal of hazardous building materials and investigation of known contamination areas prior to construction activities. These measures include conducting asbestos-containing materials and lead-based paint surveys in buildings scheduled for demolition or renovation, implementing appropriate abatement procedures, and performing additional investigation and monitoring of known underground storage tank locations to ensure that potential contamination does not adversely affect construction activities. Implementation of these measures would minimize exposure to hazardous materials during demolition and construction activities. Alternative A would result in less impacts compared to the Proposed Project.

4.5.9 Hydrology and Water Quality

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, but at a reduced intensity. The entire site has been subject to previous disturbance and development and, similar to the Proposed Project, this alternative would be subject to standard engineering practices and existing State and local regulations related to water quality and hydrology. Therefore, the hydrology and water quality impacts resulting from this alternative would be less than significant with mitigation identified in the 2014 Master Plan EIR, which would be similar to the Proposed Project. Mitigation measures identified in the 2014 Master Plan EIR for hydrology and water quality require monitoring and management of groundwater conditions during construction and incorporation of water conservation strategies into project design. These measures include installation of groundwater monitoring wells and preparation of baseline surveys to evaluate potential effects of dewatering on adjacent structures, as well as use of alternative water sources for irrigation to reduce potable water demand. Implementation of these measures would minimize potential impacts related to groundwater levels, dewatering activities, and water resource use. Alternative A would result in similar impacts compared to the Proposed Project.

4.5.10 Land Use and Planning

Alternative A would introduce a reduced intensity of uses to the Project Site as compared to the Proposed Project and would occur pursuant to the development framework established under the 2014 Master Plan. Like the Proposed Project, this alternative would not require a zone change or general plan amendment.

Implementation of Alternative A would not physically divide an established community. This alternative would occur within the boundaries of the Project Site and would not introduce new physical barriers. This alternative would include improvements to the internal circulation system to increase connectivity within the Project Site and would not alter existing access patterns between the Project Site and surrounding community. Therefore, land use and planning impacts resulting from this alternative would be less than significant. This alternative would result in similar impacts compared to the Proposed Project.

4.5.11 Noise

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, though at a reduced scale compared to the Proposed Project. Construction activities under this alternative would involve less demolition and new building construction than the Proposed Project, resulting in fewer pieces of heavy construction equipment operating simultaneously at any given time. As a result, peak construction noise

levels and vibration associated with equipment such as pile drivers, loaders, and excavators would be less compared to the Proposed Project.

However, similar to the Proposed Project, construction activities under Alternative A would still include the use of heavy equipment and demolition activities in proximity to nearby sensitive receptors. As identified in the 2014 Master Plan EIR, these activities would continue to result in noise levels that exceed applicable local construction noise standards during certain phases of construction. Although the reduced scale of development would result in fewer construction activities overall, the noise significance criteria are based on maximum noise levels rather than construction duration, and construction noise levels would remain capable of exceeding applicable standards. Therefore, consistent with the findings of the 2014 Master Plan EIR and applicable local noise threshold that remain in effect, this alternative would continue to result in significant and unavoidable construction noise and vibration impacts with the implementation of mitigation. This alternative would reduce the Proposed Project's impacts related to construction noise but would not avoid the Proposed Project's significant and unavoidable impacts related to construction noise. Construction noise mitigation measures identified in the 2014 Master Plan EIR require limiting construction activities to specified daytime hours and implementing standard noise control practices to minimize impacts to nearby sensitive receptors. These measures include restricting construction to permitted hours, maintaining equipment in good working condition, and monitoring construction activities to ensure compliance with applicable noise control requirements. Implementation of these measures would reduce construction-related noise impacts to the extent feasible, although significant and unavoidable construction noise impacts may still occur during certain phases of construction.

Operational noise under Alternative A would be less compared to the Proposed Project due to the reduced development intensity. Specifically, this alternative would generate fewer vehicle trips, reduced mechanical equipment usage, and fewer outdoor activity areas compared to the Proposed Project. As a result, operational noise levels associated with traffic, building mechanical systems, and outdoor uses would be lower than under the Proposed Project. However, as with the Proposed Project, operational noise impacts would remain less than significant with implementation of applicable mitigation measures identified in the 2014 Master Plan EIR. Operational noise mitigation measures identified in the 2014 Master Plan EIR require implementation of standard operational controls and adherence to applicable noise regulations to minimize long-term noise exposure. These measures include incorporation of design and operational practices consistent with local noise ordinances and ongoing monitoring to ensure compliance with applicable operational noise standards.

This alternative would reduce the Proposed Project's operational traffic noise; however, the traffic noise resulting from this alternative has the potential to increase ambient noise levels. Overall, this alternative would result in reduced impacts compared to the Proposed Project; the Proposed Project's significant and unavoidable impacts for construction noise would not be avoided.

4.5.12 Population and Housing

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site which would generate new employment opportunities within the Project Site, City, and County, though at a reduced scale from the Proposed Project. Because Alternative A includes a lesser amount of development than the Proposed Project, employment growth associated with this alternative would represent a proportion of regional employment growth that is less than the approximately 2 percent contribution attributed to the Proposed Project as projected by SCAG. The new employment opportunities would not be expected to induce substantial population growth. The Project Site is located within a highly urbanized area of the County and City and is characterized by a large and diverse existing labor pool. As such, new jobs associated with this alternative would reasonably be anticipated to be filled by individuals who already reside within the surrounding communities. Alternative A would not include a residential component; therefore, this alternative would not directly generate new permanent residents within the Project Site, City, or County. Additionally, like the Proposed Project, under this alternative, the extension of roads and other infrastructure improvements, which has the potential to induce indirect population growth, would not occur in undeveloped areas outside the boundaries of the Project Site. As used here, undeveloped areas refer to lands within the broader City of Los Angeles and unincorporated County areas beyond the Project Site, rather than specific undeveloped parcels immediately adjacent to the Project Site. Under this alternative, roadway and infrastructure improvements would occur primarily within the boundaries of the Project Site to support internal circulation and connectivity associated with development pursuant to the 2014 Master Plan framework. As with the Proposed Project, some infrastructure improvements may occur off-site within the City of Los Angeles; these off-site improvements would be limited in scope and would primarily serve the uses within the Campus rather than facilitate new residential development. Thus, this alternative would not directly or indirectly substantially impact the residential population within the Project Site, City, or County. Therefore, population and housing impacts resulting from this alternative would be less than significant. This alternative would result in similar impacts compared to the Proposed Project.

4.5.13 Public Services

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, at a reduced intensity from that of the Proposed Project. Thus, this alternative would generate reduced demand for public services as analyzed in the 2014 Master Plan EIR. This alternative would result in less-than-significant impacts on public services, similar to the Proposed Project; however, compared to the Proposed Project, Alternative A would reduce new demand increases on public services.

4.5.14 Recreation

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site at a reduced intensity compared to the Proposed Project and would not include a residential component. As a result, this alternative would generate fewer employment opportunities and would not introduce residents to the Project Site, City, and County. Open space and recreational opportunities identified under the 2014 Master Plan would be implemented and construction of these features would involve typical site preparation activities such as demolition, grading and excavation, and construction of permanent facilities.

Compared to the Proposed Project, Alternative A would not generate net new demand for recreational facilities associated with residential population growth because no permanent residents would be introduced under this alternative. Employees associated with Alternative A are anticipated to be drawn from the existing regional labor pool and would not substantially increase demand for recreational facilities beyond existing levels. However as identified in the 2014 Master Plan EIR, construction activities associated with development under the 2014 Master Plan, including construction of open space and recreational facilities, could result in noise and air quality impacts on nearby sensitive receptors, resulting in significant and unavoidable impacts. Although the reduced scale of development under Alternative A would result in fewer construction activities compared to the Proposed Project, these impacts would not be avoided. Accordingly, Alternative A would result in similar significant and unavoidable recreation impacts associated with construction activities and would not avoid the Proposed Project's significant and unavoidable impacts.

4.5.15 Transportation

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site, but at a reduced scale compared to the Proposed Project. This alternative would implement applicable mitigation measures from the 2014 Master Plan EIR to reduce impacts related to transportation associated with the prior thresholds utilized in the 2014 Master Plan EIR (related to level of service, and not vehicle miles traveled [VMT]). These mitigation measures include preparation of traffic control measures, roadway and intersection improvements, and transportation demand management.

Alternative A would not conflict with applicable plans, programs, ordinances or policies addressing transit, roadway, bicycle, or pedestrian facilities. Development would occur within the Campus that is served by established transportation infrastructure and located within one-half mile of a high-quality transit corridor, which supports multimodal access. Improvements under Alternative A would be limited to internal circulation and localized roadway modifications and would not remove or interfere with existing bicycle or pedestrian facilities.

With respect to vehicle miles traveled (VMT), the anticipated medical-related uses under Alternative A would occur within a transit-rich area and would generate fewer vehicle trips compared to the Proposed Project due to the reduced development intensity. Because the Project Site is within a half-mile of a high-quality transit corridor (HQTC), redevelopment at the Project Site would be screened out of a VMT analysis. Therefore, Alternative A is not anticipated to result in a significant VMT impact.

Alternative A would also avoid the significant and unavoidable transportation hazard related to freeway ramp queuing identified for the Proposed Project. The reduced development intensity under Alternative A is expected to result in a reduced number of vehicle trips and reduced demand on nearby freeway ramps. Therefore, the Proposed Project's significant and unavoidable impact associated with potential hazards due to freeway ramp queueing would be avoided. Therefore, Alternative A would have reduced impacts when compared to the Proposed Project.

4.5.16 Tribal Cultural Resources

Under Alternative A, future development and disturbance pursuant to 2014 Master Plan framework would occur on the Project Site, though at a reduced intensity and scale from the Proposed Project. Through compliance with existing law and implementation of applicable mitigation measures identified in the Cultural Resources Chapter from the 2014 Master Plan EIR (refer to Section 4.5.4 for a summary of the mitigation measures), impacts on tribal cultural resources would be less than significant, similar to the Proposed Project.

4.5.17 Utilities and Service Systems

Under Alternative A, future development pursuant to the 2014 Master Plan framework would occur on the Project Site at a reduced intensity from that of the Proposed Project. Thus, this alternative would generate reduced demand for utility and service systems, as analyzed in the 2014 Master Plan EIR. Compared to the Proposed Project, Alternative A would reduce net new demand increases on utility services, including water supply. However, the 2014 Master Plan EIR concluded impacts related to water supply would be significant and unavoidable. This alternative would result in a reduced impact on water demand compared to the Proposed Project, though the significant and unavoidable impact would remain.

4.5.18 Wildfire

The Project Site is not in the State Responsibility Area (SRA) or a very high fire hazard severity zone (FHSZ). The nearest lands classified as very high FHSZ are 0.45 miles north of the Project Site. Under Alternative A, future development pursuant to the 2014 Master Plan framework

would occur on the Project Site, at a reduced intensity from that of the Proposed Project. Impacts related to wildfire would be less than significant, similar to the Proposed Project.

4.6 ALTERNATIVE B: GENERAL HOSPITAL ADAPTIVE REUSE

The General Hospital Adaptive Reuse Alternative (Alternative B) would result in the seismic retrofit and adaptive reuse of the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District only. This includes the visitor and patient buildings in the Forecourt. As with the Proposed Project, under this alternative, selective demolition would occur within the General Hospital Building and approximately 1.2 million square feet of new uses would be developed in the General Hospital Building. The construction duration under this alternative is anticipated to occur over a period of seven years.

Additionally, as part of the adaptive reuse of the General Hospital Building, this alternative would include the demolition of non-historic buildings and features around the General Hospital Building and area immediately north of the General Hospital Building (mini warehouse building, barracks D and G, and trailers). The demolition of the mini warehouse building and barracks D and G would accommodate the construction of a new above grade parking structure north of the General Hospital Building to serve existing and new uses. The demolition of the trailers near the General Hospital Building would help accommodate the adaptive reuse of the General Hospital Building.

No additional development would occur on the remaining portions of the Project Site. The remaining portions of the Project Site would otherwise generally remain in its existing condition, except for required safety/maintenance upgrades and infrastructure upgrades necessary to support continued use of the Campus operations, which could include some off-site improvements. Demolition of additional buildings outside of the General Hospital Building and Los Angeles General Hospital–Acute Building historic district would not occur under this alternative. Under this alternative, utility infrastructure would connect to the existing infrastructure network.

This alternative would implement the proposed programming for the General Hospital Building as described in Chapter 2, *Project Description*, which includes up to 90,000 square feet of office space, leasable commercial areas, and event/dining space, as well as up to 615 residential units, within the General Hospital Building. The remaining portions of the Project Site would not be redeveloped and would remain in its existing condition, apart from required safety and maintenance upgrades to support the continued use of the Campus. As with the Proposed Project, all activities within the General Hospital Building and larger General Hospital–Acute Unit Historic District would be achieved in strict accordance with the Secretary of Interior

Standards. This alternative would require different seismic requirements as compared to the Proposed Project due to the modified programming.

4.6.1 Aesthetics

Apart from selective demolition proposed to support adaptive reuse of the General Hospital Building and demolition of non-historic buildings around the General Hospital Building (mini warehouse building, barracks D and G, and trailers), Alternative B would not result in the demolition of any existing structures on the remaining parts of the Project Site. It should be noted that select structures around the General Hospital Building were identified for demolition under the 2014 Master Plan EIR. As with the Proposed Project, this alternative could include the construction of an above-ground parking structure. No new construction on the remainder of the Project Site would occur, and overall changes to the visual character of the Project Site would continue as in current conditions, which is an active medical campus. Specifically, the General Hospital Building would be adaptively reused and key historic features on the interior and exterior of the building would be retained in accordance with the Secretary of the Interior's Standards. As development would be limited to adaptive reuse and construction of a parking structure similar to that proposed under the Proposed Project, this alternative would not substantially degrade the existing visual character or quality of the surrounding neighborhood.

Construction activities under this alternative would involve demolition, grading, and building construction similar to the Proposed Project. These activities would require temporary lighting for safety and security purposes and could introduce sources of glare from construction equipment and materials. As with the Proposed Project, such effects would be temporary, intermittent, and limited to the duration of construction activities.

Similar to the Proposed Project, Alternative B would introduce new sources of nighttime lighting associated with building occupancy and operation of the parking structure. However, lighting would be designed using standard practices, such as shielding and directional controls, to minimize spillover and glare onto surrounding areas. As development would occur within an existing developed campus environment, Alternative B would not result in substantial new sources of light or glare that would adversely affect day or nighttime views in the area. Additionally, given new construction would be limited to a parking garage, no new shade/shadow impacts would result.

This alternative would occur within the same boundaries as the Proposed Project. The Project Site is not located within a State scenic highway and the Project Site is not a part of a scenic vista. The nearest designated scenic highway is the Arroyo Seco Federal Byway. However, the Project Site is not visible from most vantage points along the byway, and only limited views of the upper portions of the General Hospital Building may be available from select locations. As Alternative B would involve adaptive reuse of the existing building and limited new construction

within the existing campus, this alternative would not adversely affect scenic resources or views from the Arroyo Seco Federal Byway.

Under this alternative, the General Hospital Building would be adaptively reused; key historic features on the interior and exterior of the building would be retained. No new aesthetic impacts would occur compared to the Proposed Project. Impacts would be less than significant, similar to the Proposed Project. However, this alternative would result in reduced impacts related to aesthetics compared to the Proposed Project due to the reduced development footprint and area of disturbance.

4.6.2 Air Quality

Under Alternative B, adaptive reuse of the General Hospital Building and accompanying parking structure would require less construction and grading as compared to the Proposed Project because construction activities would be limited to the General Hospital Building and General Hospital–Acute Unit Historic District rather than occurring across the entire Project Site. Thus, this alternative would reduce off-road equipment use and fugitive dust during construction compared to the Proposed Project. Renovation activities within the General Hospital Building and General Hospital–Acute Unit Historic District would generate short-term dust and equipment emissions, but at lower total volumes than that of the Proposed Project. This alternative would result in the demolition of existing buildings and structures (mini warehouse building, Barracks D, and Barracks G [27,510 square feet total]) north of the General Hospital Building to accommodate the proposed above ground parking structure. This alternative would result in similar construction activities, but at a substantially reduced scale compared to the Proposed Project.

Because construction activities under Alternative B would occur over a smaller area and involve fewer simultaneous construction phases, daily construction intensity would be reduced compared to the Proposed Project. Fewer pieces of off-road equipment operating simultaneously and reduced disturbance areas would result in lower daily emissions of fugitive dust and equipment exhaust. Although construction activities such as demolition, grading, and building renovation would still occur, daily emissions would be lower compared to the Proposed Project due to the reduced scale of construction activities. However, consistent with the Proposed Project, construction emissions under Alternative B would be considered significant before mitigation due to the potential for daily emissions to exceed applicable SCAQMD thresholds. Implementation of Mitigation Measures AIR-1 through AIR-6 would reduce impacts; however, similar to the Proposed Project, significant and unavoidable construction air quality impacts could still occur.

Operationally, because this alternative would substantially reduce new square footage, long-term mobile source and energy-related emissions would be lower than the Proposed Project.

Applicable regulatory controls and standard mitigation (dust control, equipment emission controls, CARB/air district rules) would apply. Under this alternative, Mitigation Measures AIR-1 through AIR-6 identified in this Draft SEIR would be implemented to reduce impacts related to air quality. Due to the elimination of industrial and warehouse uses and the reduced development footprint under Alternative B, long-term operational emissions associated with mobile sources, area sources, and energy use would be less than the Proposed Project. As a result, operational emissions under Alternative B are not anticipated to exceed applicable SCAQMD regional significance thresholds. Therefore, this alternative would avoid the Proposed Project's significant and unavoidable operational air quality impacts.

Construction activities under Alternative B could generate temporary odors associated with diesel equipment and architectural coatings; however, these odors would be short-term and typical of construction activities. Operational uses associated with Alternative B would not introduce substantial new sources of odor. Therefore, odor impacts would be similar to or reduced compared to the Proposed Project.

Similar to the Proposed Project, Alternative B would support the goals and policies of the South Coast Air Quality Management Plan (AQMP), which promotes reductions in regional emissions through improved energy efficiency, reduced vehicle trips, and implementation of emission control technologies. Due to the reduced development footprint and associated emissions compared to the Proposed Project, Alternative B would remain consistent with applicable AQMP policies.

Overall, Alternative B would result in reduced construction and long-term operational air quality emissions compared to the Proposed Project and would lessen the Proposed Project's significant air quality impacts. Alternative B would avoid the Proposed Project's significant but mitigable operational impacts and would lessen, but not avoid, the Proposed Project's significant and unavoidable construction impacts.

Alternative B would result in reduced construction and long-term operational air quality emissions compared to the Proposed Project and, therefore, is likely to lessen the air quality impacts that the Proposed Project would otherwise cause. This alternative would avoid the Proposed Project's significant but mitigable operational impacts. It would lessen the Proposed Project significant and unavoidable impacts, but would not avoid the Proposed Project's significant and unavoidable construction impacts.

4.6.3 Biological Resources

Under Alternative B, the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District would be modified through adaptive reuse and an above ground parking garage would be constructed north of the General Hospital Building. As with the Proposed Project, the buildings and structures north of the

General Hospital Building would be demolished to accommodate the new parking garage. Under this alternative, Draft SEIR Mitigation Measures BIO-1 and BIO-2 would continue to be implemented to reduce impacts related to nesting birds and bats as these resources have the potential to be present in vacant portions of the General Hospital Building. Additionally, Mitigation Measure BIO-3 would be implemented for any tree removals.

Similar to the Proposed Project, implementation of Alternative B would be required to comply with applicable federal, State, and local policies and ordinances intended to protect biological resources, including regulations protecting nesting birds and bats and requirements governing tree removal. With implementation of Draft SEIR Mitigation Measures BIO-1 through BIO-3 and compliance with applicable regulatory requirements, Alternative B would remain consistent with local policies and ordinances protecting biological resources.

Alternative B would involve a reduced scope of disturbance compared to the Proposed Project, as disturbance would be limited to the General Hospital Building and General Hospital–Acute Unit Historic District, and would not introduce new or more severe impacts to biological resources. Therefore, the biological resources impacts resulting from Alternative B would be less than significant with mitigation, consistent with the Proposed Project. This alternative would result in reduced impacts compared to the Proposed Project.

4.6.4 Cultural Resources

Under Alternative B, the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District would be modified to support adaptive reuse of the building. Draft SEIR PDFs 1 through 3 would be implemented for Alternative B as part of the required Project design, as under the Proposed Project. These PDFs would facilitate the required ongoing Proposed Project compliance with the existing Standards. Additionally, the County is pursuing Federal Historic Preservation Tax Incentives for the Acute Unit's proposed rehabilitation work, which requires rigorous review by the National Park Service (NPS) and California Office of Historic Preservation (OHP) for compliance with the Rehabilitation Standards. Impacts to the Los Angeles General Hospital–Acute Building Historic District would be less than significant. In addition, due to the distance and intervening development and topography that visually separate the Old Administration Building, this alternative would avoid the Proposed Project's potentially significant and unavoidable impacts on that historical resource.

Similar to the Proposed Project, though at a reduced intensity, ground-disturbing activities, including the demolition of existing buildings and structures north of the General Hospital Building could impact archaeological resources. Mitigation Measure CUL-2 from this Draft SEIR would be required to reduce potential impacts to archaeological resources to less than significant. Additionally, standard procedures, including adherence to the California Health and

Safety Code Section 7050.5 would be applied to avoid impacts from inadvertent discoveries of human remains. Impacts would be less than significant. This alternative would result in similar impacts on archaeological resources and any human remains present on the Project Site as compared to the Proposed Project.

4.6.5 Energy

Under Alternative B, adaptive reuse would reduce energy demand and avoid the energy-intensive processes associated with demolition and new construction as compared to the Proposed Project. Operational energy use depends on the systems installed: retrofits that electrify heating and upgrade building envelopes can produce lower operational energy and emissions. Similar to the Proposed Project, Alternative B would be required to comply with applicable State and local renewable energy efficiency requirements. Specifically, compliance with current Title 24 and implementation of site electrification measures would further reduce operational energy impacts. The Adaptive Reuse Alternative would likely result in reduced net energy consumption compared to the Proposed Project, with potential operational energy benefits if retrofit electrification and efficiency upgrades are implemented. Implementation of adaptive reuse and building efficiency upgrades under Alternative B would support the goals and policies identified in the Energy Action Plan, County of Los Angeles 2045 Climate Action Plan, and the Long-Term Energy Efficiency Strategic Plan, which promote energy conservation, electrification, and reductions in energy demand and GHG emissions. Impacts would be less than significant. This alternative would result in reduced impacts compared to the Proposed Project.

4.6.6 Geology and Soils

Under Alternative B, ground disturbance would be focused around the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District, whereas ground disturbance under the Proposed Project could occur across the entire Campus. Similar to the Proposed Project, Alternative B would be subject to Mitigation Measure GEO-1 from this Draft SEIR, as well as standard engineering practices and existing regulations.

Similar to the Proposed Project, Alternative B would be subject to seismic hazards typical of the Southern California region, including ground shaking associated with nearby active faults. However, as development under Alternative B would occur within previously developed areas and would be required to comply with applicable building codes and standard engineering practices, including the California Building Code requirements for seismic design, impacts related to seismic risks would remain less than significant, consistent with the Proposed Project.

Alternative B would not expose people or structures to substantial risks associated with erosion, landslides, lateral spreading, subsidence, liquefaction, or expansive soils beyond those

identified for the Proposed Project. The Project Site is located within an urbanized and previously developed area, and site-specific geotechnical investigations and engineering design measures would be implemented to address potential soil-related hazards. Due to the reduced extent of ground-disturbing activities under Alternative B, the potential for exposure to these hazards would be similar to or reduced compared to the Proposed Project.

Given an overall reduction in ground-disturbing activities, the potential to encounter paleontological resources would be less than the Proposed Project; however, Mitigation Measure GEO-2 would continue to be required. Therefore, the geology and soils impacts resulting from Alternative B would be less than significant with mitigation, which would be consistent with the Proposed Project.

4.6.7 Greenhouse Gas Emissions

Under Alternative B, adaptive reuse would reduce GHG emissions through substantially reduced demolition and construction activities. Demolition and construction activities would be limited to the General Hospital Building and Los Angeles General Hospital–Acute Building Historic District, whereas the Proposed Project would involve redevelopment across a larger portion of the Project Site. As a result, construction-related GHG emissions under this alternative would be reduced due to the smaller development footprint, reduced material use, and shorter duration of construction activities compared to the Proposed Project.

Operational GHG emissions would also be reduced under Alternative B due to the overall reduction in land uses and associated mobile source emissions, which represent the largest source of GHG emissions under the Proposed Project.

Similar to the Proposed Project, Alternative B would be required to comply with applicable State and local regulations intended to reduce GHG emission. Implementation of Alternative B would support the goals and policies identified in the Los Angeles County 2045 Climate Action Plan, which promotes reductions in GHG emission through energy efficiency, electrification, and reduced vehicle trips. Due to the reduced scope of development and associated decrease in construction and operational emissions, Alternative B would remain consistent with applicable GHG reduction plans.

Due to the reduced activities under this alternative compared to the Proposed Project, Alternative B would likely reduce GHG emission impacts compared to the Proposed Project and would lessen the Proposed Project's significant GHG impacts but would not avoid the Proposed Project's significant and unavoidable impacts.

4.6.8 Hazards and Hazardous Materials

Alternative B would involve the adaptive reuse of the General Hospital Building and immediately adjacent areas within the Los Angeles General Hospital–Acute Building Historic District. This alternative would result in the soft demolition activities within the General Hospital Building and demolition of existing buildings and structures north of the General Hospital Building, which would result in the removal of materials that have the potential to contain ACMs and LBP, though these are anticipated to be at reduced quantities than the Proposed Project. It would also result in demolition of non-historic buildings and features around the General Hospital Building (mini warehouse building, barracks D and G, and trailers). As with the Proposed Project, this alternative would be required to implement Draft SEIR Mitigation Measures HAZ-1a through HAZ-1f, and HAZ-2 through 4, as well as comply with current regulations and requirements governing hazardous materials.

Similar to the Proposed Project, implementation of Alternative B would not interfere with an adopted emergency response or evacuation plan. Construction activities under Alternative B would be limited to the General Hospital Building and adjacent areas and would be required to maintain emergency access to the campus at all times. The reduced scope of construction activities compared to the Proposed Project would result in fewer potential temporary disruptions to on-site circulation. During operation, Alternative B would not alter the existing circulation network in a manner that would impair emergency vehicle access or evacuation routes. Therefore, Alternative B would not interfere with implementation of adopted emergency response or evacuation plans, and impacts would be similar to or reduced compared to the Proposed Project.

Operational hazardous materials handling would remain regulated by existing laws. Implementation of standard hazardous materials management plans and abatement programs would mitigate impacts. Therefore, the hazards and hazardous materials impacts resulting from this alternative would be less than significant with mitigation, which would be similar to the Proposed Project.

4.6.9 Hydrology and Water Quality

Alternative B would result in substantially less Project Site disturbance and a lower net addition of uses compared to the Proposed Project. Similar to the Proposed Project, Alternative B would not substantially affect groundwater supplies or interfere with groundwater recharge, as development would occur within previously developed areas of the Campus and would not introduce substantial new impervious surfaces beyond those analyzed for the Proposed Project. Demolition and construction activities would be limited to the General Hospital Building and Los Angeles General Hospital–Acute Building Historic District. Due to the reduced scope of disturbance under Alternative B, impacts related to drainage patterns, erosion, runoff, and

localized flooding would be similar to or reduced compared to the Proposed Project. Implementation of standard erosion and sediment control measures and compliance with applicable drainage design requirements would minimize potential temporary construction-related effects.

Alternative B would also be required to comply with applicable regional water quality requirements, including the Los Angeles Regional Water Quality Control Board requirements and applicable stormwater management regulations. Additionally, Alternative B would not conflict with applicable water quality control plans or sustainable groundwater management requirements, as the Project Site is located within an urbanized area and development would be subject to existing regulatory controls governing stormwater and groundwater protection.

Similar to the Proposed Project, this alternative would implement Mitigation Draft SEIR Measures HYD-1 and HYD-2, and be subject to standard engineering practices and existing State and local regulations related to water quality and hydrology. Therefore, the hydrology and water quality impacts resulting from this alternative would be less than significant with mitigation, similar to the Proposed Project.

4.6.10 Land Use and Planning

Similar to the Proposed Project, Alternative B would not require a zone change or general plan amendment. This alternative would include the adaptive reuse of the General Hospital Building and adjacent areas, while introducing new residential and supporting uses to the Project Site. Development would occur within previously developed portions of the Campus and would not introduce new physical barriers or features that would divide an established community. Access to and from surrounding neighborhoods would remain substantially the same as existing conditions, and Alternative B would not reduce connectivity between surrounding land uses.

Additionally, Alternative B would be required to comply with applicable land use plans, policies, and regulations governing development within the Project Site. Because development would occur within the existing developed Project Site and would not require amendments to applicable planning documents, Alternative B would not conflict with applicable land use plans, policies, or regulations. Land use and planning impacts resulting from this alternative would be less than significant, similar to the Proposed Project.

4.6.11 Noise

Alternative B would reduce the intensity of new construction at the Project Site and would focus these activities at the General Hospital Building and immediately adjacent areas rather than occurring across a larger portion of the Project Site. Nearest off-site sensitive receptors to this

General Hospital Building include recreational uses (Hazard Park), educational uses (Francisco Bravo Magnet High), East Los Angeles Occupational Center, and some residences.

Construction noise levels under this alternative would be reduced compared to the Proposed Project due to the reduced scope of demolition and construction activities, fewer simultaneous construction phases, and reduced use of heavy equipment across the broader Project Site. However, high-noise activities such as pile driving or structural modifications could still occur near sensitive receptors and would have the potential to exceed applicable construction noise thresholds. Implementation of Mitigation Measure NOI-1 would be required; however, similar to the Proposed Project, construction noise impacts under this alternative are conservatively assumed to remain significant and unavoidable due to the potential for temporary high-noise activities in proximity to sensitive receptors.

Similar to the Proposed Project, construction activities under Alternative B would have the potential to generate vibration associated with demolition, pile driving, or heavy equipment use. However, due to the reduced scope of construction activities compared to the Proposed Project, vibration impacts would be similar to or reduced compared to those identified for the Proposed Project. Implementation of Mitigation Measure NOI-4 and standard construction practices would minimize vibration-related effects.

Operational noise impacts under this alternative would comply with the County's interior and exterior noise standards. Implementation of Mitigation Measure NOI-3a and Mitigation Measures NOI-3b would reduce impacts related to operational noise conditions. Mobile noise source associated with project-generated traffic would be reduced compared to the Proposed Project due to the lower number of residential units and reduced overall site activity levels, resulting in fewer vehicle trips and lower traffic-related noise levels along surrounding roadways.

Overall, Alternative B would reduce the magnitude of construction and operational noise compared to the Proposed Project; however, similar to the Proposed Project, temporary construction noise impacts would remain significant and unavoidable due to the potential for short-term high-noise activities and vibration activities occurring near sensitive receptors.

4.6.12 Population and Housing

Alternative B would introduce a new residential use, as well as supporting commercial and office uses, within the adaptive reuse of the General Hospital Building and would include construction of a new parking structure. Due to the limited scope of development under this alternative, the anticipated population generated under this alternative would be less than the Proposed Project. This alternative would result in a nominal increase in new residents and employees to the Project Site, City, and County. Additionally, like the Proposed Project, under this alternative, the extension of roads and other infrastructure improvements, which has the

potential to induce indirect population growth, would not occur in undeveloped areas outside the boundaries of the Project Site. As used here, undeveloped areas refer to lands within the broader City of Los Angeles and unincorporated County areas beyond the Project Site, rather than specific undeveloped parcels immediately adjacent to the Project Site. This alternative would result in substantially less net new residents and employee as compared to the Proposed Project. As with the Proposed Project, population and housing impacts resulting from this alternative would be less than significant. This alternative would result in reduced impacts compared to the Proposed Project.

4.6.13 Public Services

Alternative B would introduce new residential uses to the Project Site, as well as new commercial and office uses within the General Hospital Building. As with the Proposed Project, the net new residents and employees would be within the population projections identified by the SCAG for the SCAG region. As with the Proposed Project, this alternative would result in an increase in demand for public services, including police, fire, schools, and libraries. Compared to the Proposed Project, Alternative B would result in substantially less population increases compared to the Proposed Project and, therefore, would result in a substantially less increase in demand on public services. This alternative would result in a reduced impact on public services compared to the Proposed Project. Impacts on public services under this alternative would be similar but less than those associated with the Proposed Project.

4.6.14 Recreation

As with the Proposed Project, Alternative B would introduce residents to the Project Site; however, this alternative would result in a reduced residential population compared to the Proposed Project. This alternative would include residential amenities within the General Hospital Building. Outdoor recreational improvements assumed under this alternative could consist of rooftop amenity space located on the proposed parking structure and may include seating areas, passive recreation space, landscaping, and similar residential support features. Accordingly, the demand for parkland and recreational facilities would be proportionally lower.

Construction of these rooftop recreational amenities would occur as part of the parking structure development and would not require separate ground-disturbing activities beyond those already analyzed for Alternative B. As a result, development of these recreational amenities would not create new or more severe environmental impacts beyond those identified for the Proposed Project.

This alternative would not modify existing recreational resources on-site and would result in equal or reduced demand land local and regional parks when compared to the Proposed

Project. Overall, impacts on recreational resources under Alternative B would be similar to but less than those associated with the Proposed Project.

4.6.15 Transportation

Alternative B would introduce residential, commercial, and office uses within the adaptive reuse of the General Hospital Building; however, this alternative would result in a substantially reduced residential and employee population due to the overall reduction in development compared to the Proposed Project. The reduced number of residential units, commercial space, and office uses assumed under this alternative would result in fewer vehicle trips compared to the Proposed Project. Additionally, because the Project Site is within a half-mile of a HQTC, redevelopment at the Project Site would be screened out of a VMT analysis, consistent with the Proposed Project.

Although this alternative would reduce the number of vehicle trips compared to the Proposed Project, this alternative would generate traffic that would have the potential to result in hazards due to freeway ramp queuing. Implementation of Draft SEIR Mitigation Measures TRA-1 through TRA-3 would still be required. Therefore, the Proposed Project's significant and unavoidable impact associated with potential hazards due to freeway ramp queueing would be reduced but may not be avoided. Alternative B would have reduced impacts when compared to the Proposed Project.

Similar to the Proposed Project, Alternative B would be required to comply with applicable plans, programs, and policies governing the circulation system, including those addressing roadway operations, transit access, and bicycle and pedestrian facilities. Because development under Alternative B would occur within an existing urbanized Project Site with established transit service and pedestrian and bicycle infrastructure, this alternative would remain consistent with adopted circulation plans and policies intended to support multimodal transportation systems.

Alternative B would maintain existing access points to the Project Site and would not introduce roadway configurations that would impair emergency vehicle access. Site design and circulation improvements under Alternative B would be required to comply with applicable safety and access standards, and therefore would not create new transportation hazards. Due to the reduced scope of development and associated traffic generation, Alternative B would provide adequate emergency access and would not introduce transportation hazards beyond those identified for the Proposed Project.

Overall, Alternative B would reduce traffic generation and associated transportation impacts compared to the Proposed Project; however, similar to the Proposed Project, impacts related to freeway ramp queuing would remain significant and unavoidable.

4.6.16 Tribal Cultural Resources

Alternative B would result in substantially less ground disturbance than the Proposed Project, limited to areas around the General Hospital Building. While the overall intensity of ground-disturbing activities would be reduced, tribal consultation pursuant to AB 52 conducted for the Proposed Project indicates a sensitivity for discovery. Therefore, implementation of Draft SEIR Mitigation Measures TCR-1a through TCR-1c would still be required. Impacts for Alternative B would similarly be less than significant as with the Proposed Project.

4.6.17 Utilities and Service Systems

Alternative B would introduce residential and commercial uses within the adaptive reuse of the General Hospital Building; however, both the total square footage of development and the residential and employee population under this alternative would be reduced compared to the Proposed Project. As with the Proposed Project, the net new residents and employees would be within the population projections identified by the SCAG for the SCAG region. This alternative would result in an increase in demand for utilities and service systems, including water supply, though the demand on utilities and service systems; however, because the overall development and associated population would be substantially reduced compared to the Proposed Project, demand on utilities and service systems would be reduced compared to the Proposed Project. Utility demand calculation associated with building size and occupancy would therefore be less than those identified for the Proposed Project.

Mitigation Measure USS-1 would continue to be required under Alternative B. Overall, this alternative would result in a reduced impact on utilities and service systems compared to the Proposed Project.

4.6.18 Wildfire

The Project Site is not in an SRA or a very high FHSZ. The nearest lands classified as very high FHSZ are 0.45 miles north of the Project Site. Alternative B would not expand development into undeveloped or high fire hazard areas and would introduce fewer residents than the Proposed Project. Impacts related to wildfire would be less than significant, similar to the Proposed Project.

4.7 ALTERNATIVE C: REDUCED DENSITY MEDICAL CAMPUS ALTERNATIVE

The Reduced Density Medical Campus Alternative (Alternative C), would allow for the demolition of previously approved buildings and structures approved for demolition under the

2014 Master Plan, buildings and structures proposed for demolition under the Proposed Project, and redevelopment of the Project Site, over a 25-year horizon, with uses related to the medical and community-serving uses included by the Proposed Project.

Alternative C would implement the Proposed Project with a focus on medical-related uses and would not include the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building. Under the Proposed Project, the General Hospital Building could accommodate a mix of residential, commercial, office, patient and caregiver lodging, and community facility uses. Under Alternative C, these uses would not occur, and the building would remain unused or be retained for future determination. No residential, general office, retail, patient and care giver lodging, education, or clean tech/advanced industrial uses would be developed. Alternative C would be limited to uses including 735,300 square feet of medical office, 400,000 square feet of hospital (450-beds), 160,000 square feet of warehouse uses, and parking would be provided, which are the same square footages proposed for these uses under the Proposed Project (see Chapter 2, *Project Description*). As with the Proposed Project, this alternative would include sufficient parking spaces to accommodate demand, with no parking minimums pursuant to Assembly Hill 2097. Parking areas would be strategically located to accommodate the various uses at designated locations, in consideration of the three main access points into the Project Site (from Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue). Overall, approximately 1,295,300 square feet of new uses would be introduced on the Project Site. All development that would occur on the Project Site would be new construction, and no adaptive reuse of the General Hospital Building would occur. Demolition as previously evaluated in the 2014 Master Plan EIR would be implemented, as well as demolition of additional buildings as identified in this Draft SEIR (Viaduct, Pharmacy Building, trailers, and crypts). Similar to the Proposed Project, Campus-wide infrastructure and utility improvements necessary to implement the new uses would also occur. Like the Proposed Project, in addition to on-site improvements to infrastructure, some work may occur off-site within the City of Los Angeles, such as utility connections/replacements, public right-of-way improvements, and other related-activities. Any future off-site improvements would be coordinated directly with and overseen by the appropriate agencies (i.e., LADWP, LASAN, City of Los Angeles Department of Transportation, City of Los Angeles Department of Public Works, etc.). Additionally, similar to the Proposed Project, a minimum of ten percent of the building footprint would be developed with open space. Compared to the Proposed Project, Alternative C would result in a reduced overall development intensity, fewer new buildings, and a more limited mix of land uses.

4.7.1 Aesthetics

Alternative C would result in the demolition of existing buildings and structures included in the 2014 Master Plan EIR and redevelopment within the boundaries of the Project Site with medical-campus focused uses. The surrounding neighborhood includes a mix of commercial,

mixed-use, residential, park, and public facility uses, which together establish an urban visual character consisting of varied building types, heights, and architectural styles. Under Alternative C, development would be limited to hospital, medical office, and warehouse uses, and would not include the adaptive reuse of the General Hospital Building or buildings within the Forecourt. However, retention of the existing General Hospital Building under Alternative C would maintain an established visual landmark on the Project Site, thereby reinforcing the continuity of the campus visual character. The amount of new construction would be substantially less than that contemplated under the Proposed Project. As a result, the scale and massing of new development visible from surrounding public vantage points, as well as nearby residential and commercial areas, would be less extensive than under the Proposed Project.

As identified in the Aesthetic Chapter of this Draft SEIR for the Proposed Project, there are no scenic vistas within the Project Site viewshed, and therefore Alternative C would not result in impacts related to scenic vistas. Similar to the Proposed Project, this alternative would introduce new buildings within an existing urbanized medical campus setting that is characterized by large-scale institutional buildings, surface parking areas, internal roadway, and supporting infrastructure. Development under Alternative C would reinforce the established visual character of the Project Site, which consists primarily of hospital and institutional uses associated with the Los Angeles General Medical Center and adjacent urban development. Because Alternative C would result in fewer new buildings, reduced overall development intensity, and preservation of existing prominent campus features, visual impacts related to building massing, scale, and alteration of views would be reduced compared to the Proposed Project. While some changes to the visual environment would occur, such changes would be consistent with an urban medical campus setting and would not substantially degrade scenic vistas or visual quality of the Project Site or surrounding community.

As with the Proposed Project, this alternative would result in new sources of nighttime lighting associated with the hospital, medical office, and warehouse uses. These light sources could be visible from surrounding land uses. However, Alternative C would involve fewer illuminated buildings, reduced nighttime activity levels, and fewer exterior lighting fixtures compared to the Proposed Project. Similarly, overall introduction of new development could result in new shade/shadow, however, with an overall reduction from that of the Proposed Project.

Due to reduced new construction, aesthetic impacts under Alternative C would be less than significant and reduced compared to the Proposed Project.

4.7.2 Air Quality

Under Alternative C, development would be reduced and be limited to new construction (no adaptive reuse of General Hospital Building). As with the Proposed Project, Alternative C has the potential to result in redevelopment across the Project Site but at a reduced scale compared to

the Proposed Project. Alternative C would result in reduced construction-related air pollutant emissions compared to the Proposed Project due to substantially less new construction. Under this alternative, adaptive reuse of the General Hospital Building would not occur; this would include the construction of the associated parking structure north of the General Hospital Building. Like the Proposed Project, this alternative would include sufficient parking spaces to accommodate demand, with no parking minimums pursuant to Assembly Bill 2097, within the Project Site. Parking would be accommodated in structured and surface parking areas. Parking areas would be strategically located to accommodate the various uses at designated locations, in consideration of the three main access points into the Project Site (from Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue). Centralized parking would be paired with active parking management strategies to balance parking demand across the different user groups and peak periods.

Construction-related air pollutant emissions under Alternative C would be generated by heavy-duty equipment, material hauling, and site preparation activities. While Alternative C would involve a reduced total construction program compared to the Proposed Project, daily construction emissions, would depend on the number and type of equipment operating the acreage disturbed during individual construction phases. If similar construction equipment and daily disturbance areas are required for specific construction activities under Alternative C, short-term peak daily emissions could be similar to those of the Proposed Project. However, because Alternative C would eliminate construction associated with adaptive reuse of the General Hospital Building and associated parking facilities, the overall duration and number of concurrent construction phases would be reduced compared to the Proposed Project. Therefore, total construction emissions over the life of the project would be reduced, although daily emissions during peak construction periods may remain similar. However, demolition and construction activities could still generate criteria pollutant emissions that exceed regional thresholds.

With respect to operational emissions, Alternative C would result in reduced overall development intensity due to the elimination of residential, commercial, lodging, and community-serving uses associated with the adaptive reuse of the General Hospital Building. Removal of these uses would reduce operational sources of air pollutant emissions, including mobile sources (vehicle trips), area sources (consumer products and landscaping), and energy-related emissions. Although hospital and medical office uses totaling approximately 1,295,300 square feet would still be developed and operated under Alternative C, the elimination of up to approximately 1.2 million square feet of mixed-use development would reduce the overall level of operational activity. Operational emissions would be reduced due to lower overall development intensity, though would still be considered significant and unavoidable. Air quality impacts would remain significant and unavoidable, though reduced in magnitude.

Alternative C would also be consistent with the SCAQMD AQMP. Similar to the Proposed Project, Alternative C would support regional growth assumptions by remaining consistent with

SCAG population and employment forecasts, and would implement applicable emission reduction strategies, including compliance with SCAQMD rules, CARB regulations, and Title 24 energy efficiency standards.

With respect to sensitive receptors, nearby residential, park, and public facility uses surrounding the Project Site would remain exposed to short-term increases in pollutant concentrations during construction activities. Similar to the Proposed Project, implementation of applicable construction control measures and regulatory requirements would reduce exposure to the extent feasible. Because Alternative C would involve fewer total construction activities and reduced operational emissions compared to the Proposed Project, exposure of sensitive receptors to pollutant concentrations would be reduced compared to the Proposed Project; however, impacts may remain significant and unavoidable.

Operational activities under Alternative C could also generate odors associated with medical facility operations, equipment use, and maintenance activities. Similar to the Proposed Project, compliance with applicable SCAQMD rules governing odor control and equipment emissions would minimize odor generation. Because Alternative C would eliminate mixed-use components that could introduce additional odor sources associated with commercial and service activities, potential odor impacts would be reduced compared to the Proposed Project.

4.7.3 Biological Resources

Under Alternative C, future development of medical-related uses would occur on the Project Site. As discussed, the Project Site is fully developed with buildings, paved areas, utilities, and infrastructure associated with the Campus. As documented in this Draft SEIR, the Project Site does not support sensitive vegetation communities, and Alternative C would not expand disturbance beyond areas previously developed. Reduced construction intensity and reuse of existing structures would further limit potential effects. Similar to the Proposed Project, Draft SEIR Mitigation Measures BIO-1 and BIO-2 would continue to be required given that nesting birds and bats have the potential to be present within buildings and structures on the Project Site. Mitigation Measure BIO-3 would also be implemented for any tree removals. Therefore, biological resources impacts resulting from Alternative C would be less than significant with mitigation, which would be consistent with the Proposed Project. This alternative would result in similar impacts compared to the Proposed Project.

4.7.4 Cultural Resources

Under Alternative C, future development of medical-related uses would occur on the Project Site. Alternative C would result in the demolition of structures and buildings identified for demolition in the 2014 Master Plan EIR. Under this alternative, adaptive reuse of the General Hospital Building would not occur, including the construction of the above ground parking

structure north of the General Hospital Building. Similar to the Proposed Project, the ultimate location and massing of potential structures in relation to the existing historic buildings to remain (i.e., the Old Administration Building, Los Angeles General Hospital–Acute Building and historic district) is unknown. In addition, construction impacts resulting in vibration damage to historical resources could also occur. Mitigation Measure CUL-1 would be implemented; however, impacts on historical resources are assumed to remain significant and unavoidable, similar to the Proposed Project. Under Alternative C, there would be no adaptive reuse of the General Hospital Building, which could lead to future degradation and deterioration of this historic structure, impacting its ability to retain its historic integrity and importance. Thus, impacts to historic resources under this alternative have the potential to be greater compared to the Proposed Project.

Similar to the Proposed Project, though at a reduced intensity, ground-disturbing activities could impact archaeological resources. Mitigation Measure CUL-2 from this Draft SEIR would be required to reduce potential impacts to archaeological resources to less than significant levels. Additionally, standard procedures, including adherence to the California Health and Safety Code Section 7050.5 would be applied to avoid impacts from inadvertent discoveries of human remains. Impacts would be less than significant. This alternative would result in similar archaeological impacts compared to the Proposed Project.

4.7.5 Energy

Alternative C would reduce overall energy demand compared to the Proposed Project due to the reduced intensity of new construction. Similar to the Proposed Project, new buildings constructed under Alternative C would be required to comply with current Title 24 and implementation of site electrification measures would further reduce operational energy impacts. Alternative C would likely result in reduced net energy consumption compared to the Proposed Project, with potential operational energy benefits if retrofit electrification and efficiency upgrades are implemented.

Alternative C would be consistent with applicable State renewable energy and energy efficiency planning documents, including the Energy Action Plan and the Long-Term Energy Efficiency Strategic Plan. Development under Alternative C would be required to comply with Title 24 and CALGreen standards, and would incorporate energy-efficient building systems and electrification measures consistent with the County's CAP strategies aimed at reducing greenhouse gas emissions and improving energy efficiency in new development. Because Alternative C would eliminate adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building and result in reduced overall development intensity compared to the Proposed Project, this alternative would support the County's CAP goals by reducing overall operational energy demand and associated emissions.

Impacts would be less than significant. This alternative would result in similar or reduced impacts compared to the Proposed Project.

4.7.6 Geology and Soils

Under Alternative C, future development of medical-related uses would occur on the Project Site. The entire Project Site has been subject to previous disturbance and development. Similar to the Proposed Project, Alternative C would involve ground-disturbing activities that could expose site soils to erosion and potential geologic hazards.

Alternative C would be subject to seismic hazards typical of the Southern California region, including strong ground shaking associated with nearby active faults. As with the Proposed Project, development under Alternative C would be required to comply with applicable building requirements, which incorporate seismic design standards intended to reduce the risk of structural failure and associated hazards during seismic events. Compliance with applicable building requirements and implementation of Mitigation Measure GEO-1 from this Draft SEIR, as well as standard engineering practices would reduce impacts related to seismic hazards to less than significant levels.

Because the Project Site is relatively level and previously developed, the potential for landslides would remain low under Alternative C. However, grading and excavation activities could result in localized soil instability or erosion if not properly controlled. Implementation of standard construction BMPs, erosion control measures, and compliance with applicable grading regulations would minimize erosion potential. As such, impacts related to landslides and erosion would be less than significant and similar to those identified for the Proposed Project.

Soils underlying the Project Site may include materials with the potential for expansive soil behavior, which can affect structural stability if not properly addressed. Similar to the Proposed Project, site-specific geotechnical investigations required under Mitigation Measure GEO-1 would identify the presence of expansive soils and recommend appropriate design measures to reduce associated risks. Compliance with applicable engineering standards would ensure that impacts related to expansive soils would be less than significant with mitigation.

Given demolition and new construction would occur, ground-disturbing activities and the resulting potential to encounter paleontological resources would be similar to the Proposed Project, and Mitigation Measure GEO-2 would be required.

Overall, geology and soils impacts resulting from Alternative C would be less than significant with mitigation, which would be consistent with the Proposed Project.

4.7.7 Greenhouse Gas Emissions

Compared to the Proposed Project, Alternative C would result in reduced construction-related GHG emissions due to a lower overall amount of new construction and reduced grading and ground disturbance. Specifically, Alternative C would not include the adaptive reuse of the 1.2 million square foot General Hospital Building and not include the development of residential, general office, retail, patient and care giver lodging, education, or clean tech/advanced industrial uses, resulting in a lower total building area requiring renovation and fewer associated construction activities. Although demolition and construction of new hospital, medical office, and warehouse facilities would still occur, the overall amount of construction activity, including grading and ground disturbance, would be reduced compared to the Proposed Project. As such, construction-related GHG emissions under Alternative C would be reduced compared to the Proposed Project.

Operational GHG emissions under Alternative C would also be reduced or comparable to the Proposed Project, associated with the elimination of residential, commercial, lodging, and community-serving uses associated with the adaptive reuse of the General Hospital Building. Removal of these mixed-use components would reduce overall building square footage, energy demand, water use, solid waste generation, and mobile source emissions associated with residents, visitors, and commercial activities. As a result, total operational GHG emissions associated with energy use, water consumption, and waste generation would be lower compared to the Proposed Project.

However, operational activities under Alternative C would remain comparable in nature to the Proposed Project because major operational components including hospital, medical office, and warehouse uses totaling approximately 1,295,300 square feet would still be constructed and operated under this alternative. These uses are operationally intensive and generate substantial energy demand, employee trips, patient visits, and delivery activities. Therefore, while total operational GHG emissions would be reduced compared to the Proposed Project due to the removal of approximately 1.2 million square feet of adaptive reuse development, emissions associated with remaining hospital and medical uses would still represent a substantial portion of overall emissions and would be similar in type and operational characteristics to those associated with the Proposed Project.

Alternative C would comply with applicable County of Los Angeles General Plan 2035 policies, the County Climate Action Plan, and applicable State regulations related to GHG reduction and energy efficiency, including Title 24 energy efficiency standards and regulations adopted by the CARB. Similar to the Proposed Project, incorporation of energy-efficient building design, electrification measures, and compliance with applicable regulatory requirements would support consistency with GHG reduction goals.

Overall, Alternative C would result in reduced total GHG emissions compared to the Proposed Project due to the reduction in total building square footage and elimination of mixed-use operational activities. However, the uses proposed under this alternative would continue to generate substantial emissions and the Proposed Project GHG impacts were determined to be significant and unavoidable, GHG emissions associated with Alternative C would remain significant and unavoidable, although reduced compared to the Proposed Project.

4.7.8 Hazards and Hazardous Materials

Alternative C would result in the demolition of existing structures as previously evaluated in the 2014 Master Plan EIR and those additional buildings included under the Proposed Project (Viaduct, Pharmacy Building, trailers, and crypts). This alternative would result in the demolition of buildings that have the potential to contain hazardous materials such as ACMs and LBP, and subsurface hazardous materials could be encountered. As with the Proposed Project, this alternative would be required to implement Draft SEIR Mitigation Measures HAZ-1a through HAZ-1f, and HAZ-2 through 4, as well as comply with current regulations and requirements governing hazardous materials.

In addition to these mitigation measures, demolition and construction activities under Alternative C would be subject to existing federal, State, and local regulations governing hazardous materials, including requirements for hazardous materials surveys, abatement of ACMs and LBP, and proper transport and disposal of hazardous materials. Compliance with these regulatory requirements, including preparation and implementation of required hazardous materials management and abatement programs, would be mandatory and would reduce the potential for exposure to hazardous materials during demolition and construction activities. Operational hazardous materials handling associated with medical uses would continue to be regulated under existing laws governing hazardous materials storage, handling, and disposal.

With respect to emergency response and evacuation, Alternative C would include demolition and construction activities that could temporarily affect circulation within portions of the Project Site and along adjacent roadways. However, construction activities would be required to maintain access for emergency vehicles at all times and would be subject to review and approval by applicable emergency service providers. Construction staging and traffic control plans would ensure that emergency access routes remain unobstructed during demolition and construction activities.

During operation, Alternative C would retain the same primary site access points as the Proposed Project, including access from Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue, which would continue to support emergency vehicle access. Because Alternative C would eliminate the adaptive reuse of the approximately 1.2-million-square-foot

General Hospital Building and elimination of residential, commercial, lodging, and community-serving uses, the overall level of activity and population on the Project Site would be reduced compared to the Proposed Project. As a result, operational traffic volumes would be reduced relative to the Proposed Project, reducing the potential to interfere with adopted emergency response or evacuation plans. Therefore, the hazards and hazardous materials impacts resulting from this alternative would be less than significant with mitigation, which would be similar to the Proposed Project.

4.7.9 Hydrology and Water Quality

Under Alternative C, ground-disturbing activities would occur across the Project Site, though the amount of new construction would be reduced from that of the Proposed Project. Although ground-disturbing activities would still occur, the total amount of new construction and overall development intensity would be reduced compared to the Proposed Project due to the elimination of adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building and elimination of residential, commercial, lodging, and community-serving uses. Similar to the Proposed Project, this alternative would implement Draft SEIR Mitigation Measures HYD-1 and HYD-2, and be subject to standard engineering practices and existing State and local regulations related to water quality and hydrology.

Ground-disturbing activities under Alternative C could result in soil exposure that may increase the potential for erosion and sediment transport during construction. However, implementation of erosion control measures, construction BMPs, and compliance with NPDES permit requirements would reduce the potential for erosion and sedimentation impacts. Because the extent of grading and construction under Alternative C would be reduced compared to the Proposed Project, the potential for erosion and sedimentation would be similar in nature but reduced in magnitude.

Alternative C would introduce new impervious surfaces associated with buildings, parking areas, and internal circulation routes, which could affect surface runoff and drainage patterns. However, drainage improvements would be designed in accordance with applicable engineering standards to ensure that runoff is properly conveyed and managed without substantially altering existing drainage patterns or causing off-site flooding. Because Alternative C would involve fewer new buildings and reduced impervious surface area compared to the Proposed Project, increases in stormwater runoff would be reduced relative to the Proposed Project. Therefore, impacts related to changes in drainage patterns, runoff, and flooding potential would be similar in nature but reduced in magnitude.

With respect to groundwater supplies and groundwater recharge, Alternative C would result in reduced water demand compared to the Proposed Project due to the elimination of residential, commercial, lodging, and community-serving uses associated with the adaptive reuse of the

General Hospital Building. As a result, groundwater demand associated with potable and non-potable uses would be reduced relative to the Proposed Project. In addition, the reduced amount of impervious surface area under Alternative C would maintain a greater potential for on-site infiltration compared to the Proposed Project, thereby reducing the potential to affect localized infiltration patterns compared to the Proposed Project. Therefore, impacts related to groundwater supplies and recharge would be reduced compared to the Proposed Project.

Alternative C would also be required to comply with applicable water quality control plans, including the Los Angeles RWQCB Basin Plan, which establishes water quality objectives and implementation measures for surface water and groundwater resources in the region. Although the Project Site is not located within a groundwater basin subject to a groundwater sustainability plan, compliance with applicable RWQCB requirements, including NPDES permit requirements, along with implementation of Draft SEIR Mitigation Measures HYD-1 and HYD-2, would ensure that construction and operational activities do not result in substantial degradation of water quality.

Therefore, the hydrology and water quality impacts resulting from Alternative C would be less than significant with mitigation, similar to the Proposed Project

4.7.10 Land Use and Planning

Alternative C would introduce medical-related uses to the Project Site, including hospital, medical office, and warehouse uses, which are consistent with the existing institutional character of the Project Site as in current conditions. Like the Proposed Project, this alternative would not require a zone change or general plan amendment.

This alternative would include improvements to the internal circulation system to increase connectivity within the Project Site and improve access among hospital, medical office, and support facilities. These improvements would occur within the boundaries of the existing campus and would not alter the location of existing site access points connecting to surrounding public roadways, including Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue. As a result, access between the Project Site and surrounding neighborhoods would remain generally consistent with existing conditions and the Proposed Project.

The surrounding area includes a mix of commercial, mixed-use, residential, park, and public facility uses, and the Project Site currently functions as a large institutional and medical campus integrated within this urban setting. Development under Alternative C would occur within the existing campus footprint and would not introduce new physical barriers such as major roadways or infrastructure that would divide established neighborhoods. Similarly, Alternative C would not remove existing public access routes or disrupt pedestrian or vehicular connections between surrounding land uses. Therefore, Alternative C would not physically divide an

established community, and the relationship between the Project Site and the surrounding neighborhood would remain consistent with existing conditions.

Alternative C would not conflict with applicable land use plans, policies, or regulations. Land use and planning impacts resulting from this alternative would be less than significant, similar to the Proposed Project. Overall, land use and planning impacts resulting from this alternative would be less than significant. This alternative would result in similar impacts compared to the Proposed Project.

4.7.11 Noise

Under Alternative C, demolition and construction activities would occur across the Project Site, including removal of existing structures and construction of new hospital, medical office, and warehouse facilities. Although the total amount of construction under Alternative C would be reduced compared to the Proposed Project due to elimination of adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building and elimination of residential, commercial, lodging, and community-serving uses, construction activities would still involve the use of heavy equipment capable of generating substantial noise levels.

Construction noise levels under this alternative would depend on the type and number of equipment operating at any given time and the proximity of construction activities to nearby sensitive receptors, including surrounding residential and mixed-use areas. While the intensity and duration of construction-related noise impacts would be reduced from the Proposed Project, peak construction noise levels could be similar if similar types and number of equipment are used during individual construction phases. However, because Alternative C would involve construction of fewer buildings and elimination of adaptive reuse activities, the overall duration of construction activities and the number of concurrent construction phases would likely be reduced compared to the Proposed Project. As a result, the frequency and duration of exposure to elevated noise levels would be reduced compared to the Proposed Project, even if short-term peak noise levels remain similar during active construction periods.

Construction activities under Alternative C would also generate groundborne vibration, particularly during activities such as pile driving, drilling, or heavy equipment operation. Similar to the Proposed Project, vibration impacts could affect nearby structures and sensitive receptors depending on proximity to construction activities. Implementation of Mitigation Measures NOI-1 through NOI-4, including construction noise and vibration control measures, would be required, would reduce construction-related and operational noise, though construction noise impacts are assumed to remain significant and unavoidable, similar to the Proposed Project.

Operational noise generated under Alternative C would be associated with hospital and medical office activities, mechanical equipment, loading operations, and on-site vehicle circulation.

These operational noise sources would be required to comply with applicable County interior and exterior noise standards, similar to the Proposed Project. Because Alternative C would eliminate residential, commercial, lodging, and community-serving uses associated with adaptive reuse of the General Hospital Building, the total number of employees, residents, visitors, and service trips would be reduced compared to the Proposed Project. As a result, off-site mobile noise associated with project-generated traffic would be reduced relative to the Proposed Project due to lower overall trip generation. This alternative would likely reduce the Proposed Project's significant construction and operational noise impacts, though they would continue to be significant and unavoidable.

4.7.12 Population and Housing

Alternative C would eliminate a residential population and be limited to new employees introduced to the Project Site. Alternative C would eliminate the residential, lodging, and mixed-use components associated with the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building, and would instead be limited to development of hospital, medical office, and warehouse uses. As a result, Alternative C would not introduce a new residential population to the Project Site. Employment growth would be within the SCAG growth assumptions for the SCAG Region. Population impacts would be less than significant, similar to the Proposed Project. Therefore, Alternative C would not result in substantial unplanned population growth.

Alternative C would include improvements to internal circulation and infrastructure systems necessary to support on-site medical uses, such as upgrades to internal roadways, utilities, and service connections within the Project Site. However, these improvements would occur within the boundaries of the existing Project Site and would not include construction of new off-site roadways or major infrastructure expansions that would extend into surrounding neighborhoods. Access to the Project Site would continue to occur via existing primary access points at Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue, similar to existing conditions and the Proposed Project.

Because Alternative C would not introduce new residential uses and would not construct new off-site roadways or major infrastructure improvements that would extend into surrounding areas, this alternative would not induce substantial population growth or encourage development of additional housing or infrastructure beyond that anticipated in regional planning forecasts. In addition, elimination of residential uses associated with the General Hospital Building would reduce the demand for housing compared to the Proposed Project.

Overall, Alternative C would eliminate on-site residential population growth, would limit employment increases to levels consistent with regional forecasts, and would not introduce infrastructure improvements that would induce additional growth in surrounding communities.

Therefore, population and housing impacts associated with Alternative C would be less than significant and reduced compared to the Proposed Project.

4.7.13 Public Services

As with the Proposed Project, Alternative C would result in an increase in demand for public services, including police and fire. Because this alternative does not include a residential component, this alternative is not anticipated to result in a direct increase in demand for schools and libraries. Compared to the Proposed Project, Alternative C would not result in a residential population and would result in substantially less employee increases compared to the Proposed Project and, therefore, would result in a substantially less increase in demand on public services. Impacts would be less than significant, similar to the Proposed Project. However, this alternative would result in a reduced impact on public resources compared to the Proposed Project.

4.7.14 Recreation

Under Alternative C, no residential uses would be developed, and the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building would not occur. Under the Proposed Project, the General Hospital Building could accommodate residential, commercial, office, lodging, and community-serving uses, which would generate additional employees, visitors, residents, and patrons. Elimination of these uses under Alternative C would reduce the overall number of employees and visitors that would otherwise be associated with commercial, lodging, and community-serving activities within the General Hospital Building.

Although Alternative C would still introduce employees associated with hospital, medical office, and warehouse uses, the total employment and visitor activity would be reduced compared to the Proposed Project due to the removal of mixed-use components that typically generate additional daily visitors and support staff. As a result, Alternative C would result in fewer users of nearby recreational facilities compared to the Proposed Project.

Because Alternative C would not introduce residential uses and would result in reduced overall employee and visitor populations compared to the Proposed Project, the demand for parks and recreational facilities would be reduced relative to the Proposed Project. Similar to the Proposed Project, existing recreational facilities in the surrounding area would continue to serve the Project Site workforce and visitors, and Alternative C would not require the construction or expansion of recreational facilities. This alternative would result in a reduction of employees and visitors to the Project Site compared to the Proposed Project. Reduced employee and visitor populations would decrease demand on recreational facilities compared to the Proposed Project. Recreation impacts would be less than significant, similar to the Proposed Project.

4.7.15 Transportation

Under Alternative C, future development of medical-related uses would occur on the Project Site, including hospital, medical office, and warehouse uses. This alternative would have the potential to result in redevelopment of the Project Site but at a reduced scale compared to the Proposed Project. Overall, Alternative C is expected to result in a reduced number of vehicle trips when compared to the Proposed Project. Therefore, overall trip generation and associated operational traffic volumes would be reduced compared to the Proposed Project.

Additionally, because the Project Site is within a half-mile of a HQTC, redevelopment at the Project Site would be screened out of a VMT analysis. Although this alternative would reduce the number of vehicle trips compared to the Proposed Project, this alternative would generate traffic that would have the potential to result in hazards due to freeway ramp queuing. Implementation of Draft SEIR Mitigation Measures TRA-1 through TRA-3 would still be required. Therefore, the Proposed Project's significant and unavoidable impact associated with potential hazards due to freeway ramp queueing would be reduced but may not be avoided.

With respect to consistency with applicable circulation plans, programs, ordinances, and policies, Alternative C would maintain existing access to the Project Site via Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue, and would include improvements to internal circulation systems. Similar to the Proposed Project, Alternative C would support the use of transit, bicycle, and pedestrian facilities by maintaining proximity to existing transit services associated with the nearby HQTC and by maintaining pedestrian and bicycle connections to surrounding streets. Internal circulation improvements would be designed to enhance on-site connectivity while maintaining compatibility with existing off-site pedestrian and bicycle facilities. Therefore, Alternative C would remain consistent with applicable plans and policies addressing the circulation system.

Alternative C would also provide adequate emergency access to the Project Site. The existing primary access points at Mission Road, State Street/Marengo Street, and State Street/Zonal Avenue would remain in place and would continue to accommodate emergency vehicle access. Improvements to internal circulation under Alternative C would be designed in accordance with applicable fire and emergency access standards to ensure that emergency vehicles can safely access all areas of the Project Site.

With respect to transportation hazards, Alternative C would include roadway and site circulation improvements designed in accordance with applicable engineering and safety standards. These improvements would not introduce design features that would create new transportation hazards, such as unsafe roadway alignments or inadequate sight distance. Although Alternative C would generate traffic associated with medical uses, roadway and access improvements would be reviewed and approved by applicable agencies to ensure safe operation of the transportation system.

Overall, Alternative C would result in reduced vehicle trips and reduced traffic-related impacts compared to the Proposed Project due to the elimination of mixed-use development within the General Hospital Building. However, similar to the Proposed Project, impacts related to freeway ramp queuing may remain significant and unavoidable, although reduced in magnitude. Therefore, transportation impacts associated with Alternative C would be reduced compared to the Proposed Project.

4.7.16 Tribal Cultural Resources

Under Alternative C, demolition of existing structures and construction of new hospital, medical office, and warehouse facilities would require ground-disturbing activities, including excavation, grading, trenching, and foundation installation. These activities would have the potential to disturb previously undisturbed soils and could result in the inadvertent discovery of tribal cultural resources buried beneath the ground surface. Tribal consultation pursuant to AB 52 conducted for the Proposed Project indicates a sensitivity for discovery. Because Alternative C would involve similar types of excavation and construction activities capable of disturbing subsurface materials, the potential to encounter tribal cultural resources would remain similar in nature to that of the Proposed Project. Therefore, implementation of Draft SEIR Mitigation Measures TCR-1a through TCR-1c would still be required for Alternative C. Compliance with these measures would ensure that any tribal cultural resources encountered during construction are identified and appropriately treated in coordination with consulting tribes. Impacts for Alternative C would similarly be less than significant as with the Proposed Project.

4.7.17 Utilities and Service Systems

Alternative C would result in the demolition of existing buildings and structures included in the 2014 Master Plan EIR and redevelopment within the boundaries of the Project Site with medical-campus focused uses. Under Alternative C, the amount of new construction would be substantially less than that contemplated under the Proposed Project. Development would include approximately 735,300 square feet of medical office uses, 400,000 square feet of hospital uses (450 beds), and 160,000 square feet of warehouse uses, consistent with the square footage of these medical-related components under the Proposed Project. However, Alternative C would not include the adaptive reuse of the approximately 1.2-million-square-foot General Hospital Building, which under the Proposed Project could accommodate residential, commercial, office, lodging, and community-serving uses. As a result, the total overall building square footage under Alternative C would be substantially less than that contemplated under the Proposed Project.

As with the Proposed Project, employees would be within the population projections identified by SCAG for the SCAG region. However, because Alternative C would eliminate up to approximately 1.2 million square feet of adaptive reuse development, utility demand associated

with building operations including water supply, wastewater generation, solid waste disposal, and energy consumption would be reduced compared to the Proposed Project. Utility demand calculations are based in part on building size and operational intensity; therefore, the reduced overall building square footage under Alternative C would result in lower overall utility demand relative to the Proposed Project. Alternative C would still increase demand for utilities and service systems relative to existing conditions due to the introduction of new hospital, medical office, and warehouse facilities. Draft SEIR Mitigation Measure USS-1 would still be required to address potential infrastructure capacity needs. Impacts would be less than significant with mitigation, similar to the Proposed Project. However, this alternative would result in a reduced impact on utilities and service systems compared to the Proposed Project.

4.7.18 Wildfire

The Project Site is not in an SRA or a very high FHSZ. The nearest lands classified as very high FHSZ are 0.45 miles north of the Project Site. Alternative C would not expand development into undeveloped or high fire hazard areas and would introduce fewer residents than the Proposed Project. Impacts related to wildfire would be less than significant, similar to the Proposed Project.

4.8 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-2, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the Proposed Project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project. As analyzed in the preceding discussions, Alternatives B and C would not eliminate any of the identified significant and unavoidable impacts of the Proposed Project.

Table 4-2 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project[1]	Alternative A: No Project Alternative	Alternative B: General Hospital Reuse	Alternative C: Reduced Density Medical Campus Alternative
3.1 Aesthetics	LTS	↓	↓	↓
3.2 Air Quality	SU	↓	↓	↓
3.3 Biological Resources	LTS/M	=	↓	=
3.4 Cultural Resources	SU	=/↑	=/↓	=/↑
3.5 Energy	LTS	↓	↓	=/↓
3.6 Geology and Soils	LTS/M	=	=	=

Table 4-2 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project[1]	Alternative A: No Project Alternative	Alternative B: General Hospital Reuse	Alternative C: Reduced Density Medical Campus Alternative
3.7 Greenhouse Gas Emissions	SU	↓	↓	=/↓
3.8 Hazards and Hazardous Materials	LTS/M	=	=	=
3.9 Hydrology and Water Quality	LTS/M	=	=	=
3.10 Land Use and Planning	LTS	=	=	=
3.11 Noise	SU	↓	↓	↓
3.12 Population and Housing	LTS	=/↓	↓	↓
3.13 Public Services	LTS	=/↓	↓	↓
3.14 Recreation	SU	↓	↓	↓
3.15 Transportation	SU	↓	↓	↓
3.16 Tribal Cultural Resources	LTS/M	=	=	↓
3.17 Utilities and Service Systems	SU	↓	↑	↓
3.18 Wildfire	LTS	=	=	=

Notes:

1. The impacts listed in this column represent the highest significance determination for each respective topic.

NI No Impact
LTS Less than Significant
LTS/M Less than Significant with Mitigation
SU Significant and Unavoidable

↓ Reduced impact in comparison to the proposed project
= Similar impact in comparison to the proposed project
↑ Greater impact in comparison to the proposed project

Table 4-3, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the Proposed Project's objectives.

Table 4-3 Ability to Meet Proposed Project Objectives Summary

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: General Hospital Reuse	Alternative C: Reduced Density Medical Campus Alternative
1. To meet the current and future healthcare needs of Los Angeles region by supporting the continued provision of essential medical services and enabling evolving models of care.	Yes	Partially Met	No	Yes
2. To redevelop the campus in a manner that advances whole-person health, including reducing housing insecurity, improving access to healthcare services, expanding access to open space, advancing transportation equity, and supporting social and economic wellbeing.	Yes	Partially Met	Partially Met	Partially Met
3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.	Yes	No	Yes	No
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, in order to address housing needs of the County and the greater Los Angeles region.	Yes	No	Partially Met	No
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-	Yes	Partially Met	Partially Met	Partially Met

Table 4-3 Ability to Meet Proposed Project Objectives Summary

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: General Hospital Reuse	Alternative C: Reduced Density Medical Campus Alternative
serving commercial and institutional uses.				
6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.	Yes	Partially Met	Partially Met	No
7. To develop multimodal circulation that enhances connectivity within the Campus, specifically between east and west Campus and improves access to adjacent neighborhoods, institutions, and regional transportation systems.	Yes	Partially Met	No	Partially Met
8. To create a cohesive, campus-wide landscape and open space framework that provides abundant, accessible public and semi-public spaces to support community activity, wellness, and social interaction.	Yes	Partially Met	Partially Met	No
9. To replace and modernize aging utilities and infrastructure to support long-term campus operations.	Yes	Partially Met	Partially Met	Partially Met
10. To promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.	Yes	No	Partially Met	No

Table 4-3 Ability to Meet Proposed Project Objectives Summary

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: General Hospital Reuse	Alternative C: Reduced Density Medical Campus Alternative
11. To develop resilient infrastructure designed to withstand and recover from natural hazards while providing reliable, sustainable systems that support both project operations and serve as a community resource during emergencies.	Yes	Partially Met	Partially Met	Yes

4.8.1 Summary of Alternative A: No Project Alternative/ 2014 Master Plan

Under Alternative A, the Proposed Project would not be implemented. Instead, the Project Site would continue to develop under the previously adopted 2014 Master Plan, and ongoing uses and operations would remain in place. No new construction or redevelopment envisioned under the Proposed Project would occur. This alternative represents the "No Project" scenario under CEQA and reflects the reasonably foreseeable conditions at the Project Site if the County continues to rely on the 2014 planning framework.

As summarized in Table 4-2, Alternative A would generally reduce short-term environmental impacts associated with construction, including aesthetics, air quality, energy, GHG, noise and vibration, population and housing, public services, recreation, transportation, and utilities and service systems. However, several operational impacts would remain when compared to the Proposed Project because it would avoid the scale and intensity of construction and redevelopment associated with the Proposed Project. Specifically, Alternative A would reduce impacts related to aesthetics, air quality, energy, GHG, population and housing, public services, construction noise and vibration, recreation, transportation, and utilities and service systems. Certain operational impacts related to environmental topics areas such as transportation (vehicle trips), air quality and GHG emissions (vehicle and building operations), noise (routine vehicle activity and maintenance), and utilities and energy (continued operation of aging infrastructure), would be similar to existing conditions and, therefore, similar to or slightly reduced compared to the Proposed Project.

As shown in Table 4-2, Alternative A would reduce most of the Proposed Project's significant and unavoidable impacts; however, these impacts would not be avoided. Critically, Alternative A would increase impacts on cultural resources and would not address existing deficiencies in open space, and sustainability. Additionally, the continuation of aging infrastructure and outdated site design could exacerbate cumulative impacts over time. For example:

- Open Space and Circulation: Retaining the 2014 Master Plan Pattern would enhance the existing circulation; however, not to the same extent as the Proposed Project, and would maintain insufficient open space. The remaining square footage under this alternative would result in 245,000 square feet reduction in wellness uses. This alternative would result in reduced community well-being.
- Sustainability and Resilience: Without integrated sustainability measures, the Project Site would remain less resilient to climate change, extreme weather, or further public health needs, indirectly increasing environmental stressors.

Overall, Table 4-2 demonstrates that while Alternative A would reduce impacts, this alternative would not address existing deficiencies and would forego the long-term environmental benefits associated with comprehensive redevelopment.

A summary of Alternative A relative to each Proposed Project objective is provided in Table 4-3, *Ability to Meet Proposed Project Objectives Summary*. Table 4-4, *Ability to Meet Proposed Project Objectives – Alternative A*, provides a comparison of Alternative A's ability to meet the Proposed Project's objectives. In summary, Alternative A would not meet the majority of the Project Project's objectives. Specifically, Alternative A would not meet objectives 3, 4, and 10.

Table 4-4 Ability to Meet Proposed Project Objectives – Alternative A

Proposed Project Objectives	Alternative A Comparison
1. To meet the current and future healthcare needs of Los Angeles region by supporting the continued provision of essential medical services and enabling evolving models of care.	**Partially Met.** This alternative would not interfere with the operation of the existing Medical Center. Alternative A would result in a 535,300 square foot reduction in Medical Office use as compared to the Proposed Project. Thus, this alternative would partially meet this objective because Alternative A would include supporting medical uses but not to the same extent as the Proposed Project.
2. To redevelop the campus in a manner that advances whole-person health, including reducing housing insecurity, improving access to healthcare services, expanding access to open space, advancing transportation equity,	**Partially Met.** This alternative would include Wellness Oriented Community Facilities and Medical Office and enhance pedestrian circulation, which would help to advance whole-person health. However, this alternative would not include a residential or commercial

Table 4-4 Ability to Meet Proposed Project Objectives – Alternative A

Proposed Project Objectives	Alternative A Comparison
and supporting social and economic wellbeing.	component. Thus, this alternative would partially meet this objective because Alternative A would not support housing insecurity or social and economic wellbeing.
3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, community facilities, and civic significance while enabling functional modernization and long-term economic viability.	**Not Met.** This alternative would not result in the adaptive reuse of the General Hospital Building, which would include patient and caregiving lodging, residential units, commercial uses, and community facilities uses. Thus, this alternative would not preserve or adaptive reuse the General Hospital Building and would not enable functional modernization and long-term economic viability.
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, in order to address housing needs of the County and the greater Los Angeles region.	**Not Met.** This alternative would not include a residential component. Thus, this alternative would not maximize the provision of new housing to address the housing needs of the county and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.	**Partially Met.** This alternative would provide opportunities for employment to the area; however, due to the reduction in development as compared to the Proposed Project, this alternative would generate less opportunities for employment as compared to the Proposed Project. Thus, this alternative would partially promote economic and workforce development.
6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.	**Partially Met.** This alternative would include Wellness Oriented Community Facilities uses, Medical Office uses, General Office uses, and Research and Development uses. Alternative A would not provide educational, commercial, or public-facing using that would support daily needs, encourage shared use of the campus, or reinforce the campus' role as an accessible and welcoming civic place. This alternative would provide community-serving and community facilities. Thus, this alternative would partially reinforce the Campus' role as an accessible and welcoming civic place.
7. To develop multimodal circulation that enhances connectivity within the Campus, specifically between east and west Campus,	**Partially Met.** This alternative would result in an enhanced connection between the east and west portions of the Project Site. No new

Table 4-4 Ability to Meet Proposed Project Objectives – Alternative A

Proposed Project Objectives	Alternative A Comparison
and improves access to adjacent neighborhoods, institutions, and regional transportation systems.	comprehensive redevelopment or reconfiguration of the Campus would occur beyond what is approved. This alternative would not include the development of the mobility hubs under the Proposed Project. Thus, this alternative would partially improve access to adjacent neighborhoods, institutions and regional transportation system.
8. To create a cohesive, campus-wide landscape and open space framework that provides abundant, accessible public and semi-public spaces to support community activity, wellness, and social interaction.	**Partially Met.** This alternative would include Wellness Oriented Community Facilities uses. However, due to the reduced development proposed under Alternative A, this alternative would provide less opportunities for spaces to support community activities Additionally, this alternative would also enhance pedestrian circulation; however, not to the same extent as the Proposed Project. Thus, this alternative would partially support community activity, wellness, and social interaction.
9. To replace and modernize aging utilities and infrastructure to support long-term campus operations.	**Partially Met.** This alternative would replace and modernize aging utilities to support the remaining square footage planned under the 2014 planning framework. However, this alternative would not result in the replacement or modernization of aging utilities and infrastructure within the General Hospital Building. Thus, this alternative would partially replace and modernize aging utilities and infrastructure.
10. To promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.	**Not Met.** This alternative would not support compact development because this alternative would not include mixed uses. Additionally, this alternative would not result in the adaptive reuse of the General Hospital Building or replacement of infrastructure associated with the General Hospital Building. Moreover, Alternative A would not result in the construction of up to two mobility hubs within the Project Site. Furthermore, this alternative would not include the sustainable designs proposed under the Proposed Project. Thus, this alternative would not

Table 4-4 Ability to Meet Proposed Project Objectives – Alternative A

Proposed Project Objectives	Alternative A Comparison
	promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.
11. To develop resilient infrastructure designed to withstand and recover from natural hazards while providing reliable, sustainable systems that support both project operations and serve as a community resource during emergencies.	**Partially Met.** The 2014 Master Plan's infrastructure was not designed to withstand and recover from natural hazards while providing reliable, sustainable systems that would support both project operations. The Project Site would continue to serve as a community resource during emergencies.

Failure to fully meet the Proposed Project's objectives would have tangible environmental and operational consequences, including reliance on outdated systems that may be less energy- and water-efficient, continued circulation and safety deficiencies, and lost opportunities to integrate long-term sustainability and resilience measures.

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

4.8.2 Summary of Alternative B: General Hospital Reuse

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

use but does not pursue the comprehensive, multi-use redevelopment envisioned in the Proposed Project.

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

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

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

- Utilities and Energy Efficiency: Continued reliance on outdated electrical, water, and mechanical systems would maintain higher energy and water demand relative to a fully modernized Campus, with potential inefficiencies and operational disruptions over time.
- Infrastructure Resilience: Retaining aging stormwater, circulation, and utilities infrastructure would limit the Project Site's resilience to seismic events, flooding, and future climate impacts.
- Environmental Sustainability: Campus-wide sustainability measures, including energy efficiency design, stormwater management, and open space enhancements, would be forgone, reducing potential reductions in GHG emissions in the long term.

An evaluation of Alternative B's consistency with each Proposed Project's objectives is provided in Table 4-5, *Ability to Meet Proposed Project Objectives – Alternative B*. In summary, this alternative would not meet objectives 1 and 7. Alternative B would partially meet objectives 2, 4 through 11, and would meet objective 3. By limiting improvements to a small geographic area, this alternative would fail to achieve the scale, flexibility, and integrated vision of the Proposed Project.

Table 4-5 Ability to Meet Proposed Project Objectives – Alternative B

Proposed Project Objectives	Alternative A Comparison
1. To meet the current and future healthcare needs of the Los Angeles region by supporting the continued provision of essential medical services and enabling evolving models of care.	**Not Met.** This alternative would result in the adaptive reuse of the General Hospital Building. Alternative B would not include uses that would support the existing Medical Center. Thus, this alternative would not support the provision of medical services.
2. To redevelop the campus in a manner that advances whole-person health, including reducing housing insecurity, improving access to healthcare services, expanding access to open space, advancing transportation equity, and supporting social and economic wellbeing.	**Partially Met.** This alternative would result in the adaptive reuse of the General Hospital Building, which would include residential uses, commercial uses, and event/dining space. Alternative B would help to reduce housing insecurity and would include uses that would support social and economic wellbeing. However, this alternative would not expand access to open space nor improve access to healthcare services. The existing pedestrian circulation system would be maintained. Thus, this alternative would partially redevelop the Campus that advances whole-person health.
3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.	**Met.** This alternative would result in the adaptive reuse of the General Hospital Building and would maintain the architecture, include community facilities, and retain civic significance of the building. This alternative would enable the functionality of the building and support long-term economic viability of the building and the overall Project Site.
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, to address housing needs of the County and the greater Los Angeles region.	**Partially Met.** This alternative would include up to 615 residential units within the General Hospital Building. However, this alternative would not maximize the provision of new housing on the Project Site. Under the Proposed Project, up to 3,200 residential units would be provided. This alternative would result in a 2,585 residential unit reduction compared to the Proposed Project. Thus, this alternative would partially provide new housing to the County and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding	**Partially Met.** This alternative would include commercial, community facilities, and

Table 4-5 Ability to Meet Proposed Project Objectives – Alternative B

Proposed Project Objectives	Alternative A Comparison
communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.	event/dining space within the General Hospital Building that would benefit surrounding communities and provide employment opportunities. Thus, this alternative would partially promote economic and workforce development.
6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the campus, and reinforce the campus's role as an accessible and welcoming civic place.	**Partially Met.** This alternative would include community-serving uses; however, these uses would be localized to the General Hospital Building. However, this alternative would not include institutional or education uses. Thus, this alternative would partially provide community serving uses.
7. To develop multimodal circulation that enhances connectivity within the Campus, specifically between east and west Campus, and improves access to adjacent neighborhoods, institutions, and regional transportation systems.	**Not Met.** This alternative would result in the adaptive reuse of the General Hospital Building. This alternative would not develop multimodal circulation would not enhance connectivity within the Campus, specifically between east and west Campus. Redevelopment activities would be localized to the General Hospital Building. Thus, this alternative would not enhance connectivity within the Campus nor would this alternative improve access to adjacent neighborhoods, institutions, and regional transportation systems.
8. To create a cohesive, campus-wide landscape and open space framework that provides abundant, accessible public and semi-public spaces to support community activity, wellness, and social interaction.	**Partially Met.** This alternative would result in the adaptive reuse of the General Hospital Building, which would include residential units, commercial uses, community facilities, and event/dining space. Alternative B would support community activity, wellness, and social interaction. However, redevelopment would be localized to the General Hospital Building. Therefore, this alternative would not result in Campus-wide landscape and open space. Thus, this alternative would partially support community activity, wellness, and social interaction.
9. To replace and modernize aging utilities and infrastructure to support long-term campus operations.	**Partially Met.** This alternative would result in the replacement and modernization of aging utilities within the General Hospital Building. However,

Table 4-5 Ability to Meet Proposed Project Objectives – Alternative B

Proposed Project Objectives	Alternative A Comparison
	replacement and modernization of aging utilities and infrastructure would not occur across the entire campus. Thus, this alternative would partially replace and modernize aging utilities and infrastructure.
10. To promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.	**Partially Met.** This alternative would include the adaptive reuse of the General Hospital and would include a mix of uses, including residential. The adaptive reuse of the General Hospital Building would also include the installation of efficient infrastructure systems to support the mix of uses proposed within the building. Because this alternative would co-locate jobs and housing to the Project Site, this alternative could reduce reliance on single-occupancy vehicle travel. However, redevelopment on the Project Site would be localized to the General Hospital Building. Thus, this alternative would partially promote environmental sustainability.
11. To develop resilient infrastructure designed to withstand and recover from natural hazards while providing reliable, sustainable systems that support both project operations and serve as a community resource during emergencies.	**Partially Met.** This alternative would localize redevelopment at the General Hospital Building. Therefore, this alternative would not support the development of resilient infrastructure. This alternative would not preclude the Project Site as continuing to serve as a community resource during emergencies.

Alternative B would provide benefits in preserving the historic General Hospital Building. As reflected in Table 4-3, Alternative B meets the adaptive reuse objective most effectively, and partially advances the housing and economic development objectives of the Proposed Project. However, due to the limited geographic scope of improvements, Alternative B would not meet the majority of the Proposed Project's objectives and would not achieve the County's long-term vision for a modern, integrated health supportive campus. Overall, Alternative B would partially meet certain objectives, particularly those related to historic preservation and limited economic activation, but would not adequately meet healthcare, housing, infrastructure, and long-term planning objectives compared to the Proposed Plan.

4.8.3 Summary of Alternative C: Reduced Density Medical Campus Alternative

Under Alternative C, redevelopment within the Project Site would be limited to medical-related uses. This alternative would allow for the continued operation and incremental modernization of the Medical Center Campus, allowing for renovation, replacement, and limited expansion of existing buildings as needed to support ongoing medical, administrative and supportive functions.

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

Similar to the Proposed Project, the ultimate location and massing of potential structures in relation to existing historic buildings to remain (i.e., the Old Administration Building, Los Angeles General Hospital–Acute Building and historic district) is unknown. Mitigation Measure CUL-1 would be implemented; however, impacts are assumed to remain significant and unavoidable, similar to the Proposed Project. However, because adaptive reuse of the General Hospital Building would not occur, impacts on historic resources have the potential to be greater.

An evaluation of Alternative C's consistency with each Proposed Project's objective is provided in Table 4-6, *Ability to Meet Proposed Project Objectives – Alternative C*. In summary, Alternative C would meet objectives 1 and 11 and would partially meet objectives 2, 5, 7, and 9. While Alternative C would maintain essential healthcare operations, preserve historic resources, and allow phased redevelopment, it would not achieve the same level of housing delivery, economic opportunity, sustainability, or long-term flexibility as the Proposed Project.

Table 4-6 Ability to Meet Proposed Project Objectives – Alternative C

Proposed Project Objectives	Alternative A Comparison
1. To meet the current and future healthcare needs of the Los Angeles region by supporting the continued provision of essential medical services and enabling evolving models of care.	**Met.** This alternative would result in the development of medical-related uses. This alternative would allow for continued operation and incremental modernization of the Campus. Alternative C would introduce use that would

Table 4-6 Ability to Meet Proposed Project Objectives – Alternative C

Proposed Project Objectives	Alternative A Comparison
	support the existing Medical Center. Thus, this alternative would include uses to meet the healthcare needs of the Los Angeles region.
2. To redevelop the campus in a manner that advances whole-person health, including reducing housing insecurity, improving access to healthcare services, expanding access to open space, advancing transportation equity, and supporting social and economic wellbeing.	**Partially Met.** This alternative would result in the development of medical-related uses; however, this alternative would not include a residential component. Alternative C would also include circulation improvements, including connection between the eastern and western portions of the Project Site. This alternative would not include commercial, office, patient and caregiver lodging, or community facilities. Therefore, this alternative would not support social and economic wellbeing. Thus, this alternative would partially redevelop the campus that advances whole person health.
3. To preserve and adaptively reuse the historic General Hospital, maintaining architectural, cultural, and civic significance while enabling functional modernization and long-term economic viability.	**Not Met.** This alternative would not include the adaptive reuse of the General Hospital Building. Alternative would maintain the existing condition of the General Hospital. Thus, this alternative would not preserve and adaptively reuse the General Hospital Building.
4. To maximize the provision of new housing, including affordable, supportive, workforce, and other needed housing types, to address housing needs of the County and the greater Los Angeles region.	**Not Met.** This alternative would not include a residential component. Thus, this alternative would not maximize the provision of new housing to address housing needs of the County and the greater Los Angeles region.
5. To promote economic and workforce development that benefits surrounding communities, including opportunities for job creation, workforce training, and local-serving commercial and institutional uses.	**Partially Met.** This alternative would include medical-related uses, which would provide employment opportunities. However, this alternative would not include commercial and institutional uses. The elimination of institutional uses would remove opportunities for workforce development. Thus, this alternative would partially promote economic development.
6. To provide community-serving, institutional, educational, commercial, community facilities, and public-facing uses that support daily needs, encourage shared use of the	**Not Met.** This alternative would not include community-serving, institutional, educational, commercial, community facilities. Alternative B would include medical-related uses. Thus, this alternative would not provide uses that would

Table 4-6 Ability to Meet Proposed Project Objectives – Alternative C

Proposed Project Objectives	Alternative A Comparison
campus, and reinforce the campus's role as an accessible and welcoming civic place.	reinforce the Campus' role as an accessible and welcoming civic place.
7. To develop multimodal circulation that enhances connectivity within the Campus, specifically between east and west Campus, and improves access to adjacent neighborhoods, institutions, and regional transportation systems.	**Partially Met.** In addition to the medical-related uses, this alternative would include circulation improvements, including enhancing connection between the eastern and western portions of the Campus. However, this alternative would not include the mobility hubs proposed under the Proposed Project. Thus, this alternative would partially enhance connectivity between the Campus and adjacent neighborhoods, institutions, and regional transportation systems.
8. To create a cohesive, campus-wide landscape and open space framework that provides abundant, accessible public and semi-public spaces to support community activity, wellness, and social interaction.	**Not Met.** This alternative would not include community facilities uses. Alternative C would not include the construction or expansion of open space or recreational facilities. Thus, this alternative would not create spaces that would support community activity, wellness, and social interaction.
9. To replace and modernize aging utilities and infrastructure to support long-term campus operations.	**Partially Met.** This alternative would redevelop the Project Site with medical-related uses and would include infrastructure and utility improvements necessary to implement the new uses. However, the General Hospital Building would not be adaptively reused and the existing infrastructure and utility systems would be retained. Thus, this alternative would partially replace and modernize aging utilities and infrastructure.
10. To promote environmental sustainability through compact development, adaptive reuse, efficient infrastructure systems, and reduced reliance on single-occupancy vehicle travel.	**Not Met.** This alternative would not include a mix of uses that would compact development and help to reduce reliance on single-occupancy vehicle travel as this alternative would not co-locate housing and employment opportunities. Alternative C would replace and modernize again utilities throughout the Project Site except for the General Hospital Building. Thus, this alternative would partially promote environmental sustainability.

Table 4-6 Ability to Meet Proposed Project Objectives – Alternative C

Proposed Project Objectives	Alternative A Comparison
11. To develop resilient infrastructure designed to withstand and recover from natural hazards while providing reliable, sustainable systems that support both project operations and serve as a community resource during emergencies.	**Met.** This alternative would include the infrastructure improvements anticipated under the Proposed Project. Additionally, this alternative would support the Project Site's ability to serve as a community resource during emergencies. Thus, this alternative would meet this objective.

4.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the Proposed Project and the alternatives, State CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the Proposed Project selected may not be the alternative to the Proposed Project that best meets the goals or needs of the County. Because State CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the Proposed Project, the Proposed Project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

As presented in Table 4-2, Alternative A, Alternative B, Alternative C would reduce certain environmental impacts compared to the Proposed Project. However, the scale and nature of the reductions vary. Alternative A would reduce construction-related impacts of the Proposed Project, but impacts would remain significant and unavoidable.

The environmental inferiority of Alternative A is driven by its land use pattern. Alternative A would continue to concentrate non-residential, job-generating uses in an area with a high concentration of employment and relatively low residential density, perpetuating a job–housing imbalance. However, this alternative would avoid the Proposed Project's significant and unavoidable impacts related to transportation hazard. Improvements on the Project Site would be based on the framework identified in the 2014 Master Plan. Specifically, the West Central Plant would be relocated to elsewhere on the Project Site and a Central Utility Plant (CUP) would be constructed. Under the 2014 Master Plan, the CUP was proposed to be located at the

site where Restorative Care Village Phase I is located. Thus, relocation of the West Central Plant to this area of the Project Site is not feasible and another viable location for the replacement CUP would be required. Under Alternative A, required safety/maintenance upgrades and infrastructure upgrades necessary to support continued use of the Campus would remain. Compared to Alternative B, which limits redevelopment to the adaptive reuse of the General Hospital Building and Los Angeles General Hospital–Acute Building Historic District, Alternative A would result in greater overall environmental disturbance than Alternative B due to infrastructure relocation and broader Campus upgrades.

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

Alternative C would reduce construction-related impacts of the Proposed Project, but impacts would remain significant and unavoidable. Alternative C has the potential to result in greater long-term environmental impacts due to lack of improvements to the General Hospital Building. Alternative C would result in greater overall environmental disturbance than Alternative A and B as this alternative would result in demolition and construction across the Project Site. Alternative C would reduce the Proposed Project's significant and unavoidable impacts; however, these impacts would remain significant and unavoidable.

Based on the comparative analysis presented in this chapter of the Draft SEIR, Alternative B is identified as the Environmentally Superior Alternative. While this alternative would not meet all of the Proposed Project's objectives, as shown in Table 4-3, with respect to providing a mix of housing, job opportunities, varied land uses, community benefits, and developing a comprehensive planning and entitlement framework, this alternative would result in fewer overall environmental impacts than Alternatives A and C, as shown in Table 4-2. When weighing both construction and operational impacts, Alternative B presents the most balanced and environmentally advantageous outcome among the alternatives evaluated.

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

- Reduce the magnitude of the Proposed Project's greatest impacts,
- Avoid the long-term environmental drawbacks of the No Project Alternative, and
- Provide meaningful environmental and historic benefits through reuse of the existing General Hospital Building and Los Angeles General Hospital–Acute Building Historic District.

5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the Proposed Project based on the analyses presented in Sections 3.1 through 3.18 of this Draft SEIR. The topics covered in this chapter include effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects. A more detailed analysis of the effects that the Proposed Project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapter 3, *Environmental Analysis*, of this Draft SEIR.

5.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) State Guidelines Section 15128, "Effects Not Found to Be Significant," allows environmental issues for which there is no likelihood of significant impact to be identified and not analyzed further in the EIR. The 2014 Master Plan EIR determined that the 2014 Master Plan Project would not result in significant environmental impacts related to Agriculture and Forestry Resources and Mineral Resources. Additionally, no comments received in response to the Notice of Preparation (NOP) present contrary information related to these topics. Therefore, these topics are appropriately, briefly analyzed in this chapter.

5.1.1 Agriculture and Forestry Resources

The 2014 Master Plan EIR determined that no impacts to agricultural resources would occur under the 2014 Master Plan. The Project Site's location and land use type have not changed since the certification of the 2014 Master Plan EIR. The Project Site is on fully developed County-owned land in a highly urbanized part of the City of Los Angeles. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the Project Site is classified as Urban and Built-Up Land and is not near or within any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2025a). The Project Site is not zoned or subject to a Williamson Act contract (DOC 2025b). Additionally, the Project Site does not conflict with existing zoning for or cause rezoning of any forest land (as defined in Public Resources Code sec. 12220[g]), timberland (as defined by Public Resources Code sec. 4526), or timberland zoned timberland production (as defined by Government Code sec. 51104(g)) (CDFW 2015). Thus, there is no significant impact on agriculture or forestry resources, because implementation of the Proposed Project would not convert agricultural land to a nonagricultural use or forest use to non-forest use. No impact would occur.

5.1.2 Mineral Resources

The 2014 Master Plan EIR determined that the Project Site does not contain known mineral resources of regional or state value. The Project Site's location and land use type have not changed since the certification of the 2014 Master Plan EIR. The Project Site is not identified as a locally important mineral resource discovery site in local plans, including the Conservation Element of the County's General Plan, the City of Los Angeles General Plan and Framework Element, or the Northeast Los Angeles Community Plan. The Project Site is currently highly developed and disturbed by prior development and is not used for mineral extraction. Implementation of the Proposed Project would require typical construction materials, including concrete and asphalt, which incorporate aggregate resources such as sand, gravel, and crushed rock. Aggregate materials are widely available throughout the Southern California region and are produced by numerous permitted mining operations and material suppliers that serve the regional construction market. The amount of aggregate materials required for the Proposed Project would be minimal relative to the existing regional supply and would not adversely affect the availability of mineral resources for future use. Thus, there is no significant impact on mineral resources. No impact would occur.

5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

State CEQA Guidelines Section 15126.2(a) requires that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." State CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Chapter 1, *Executive Summary*, of this Draft SEIR includes a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. If the County, as the lead agency, determines that unavoidable significant adverse impacts will result from the Proposed Project, the County must prepare a "Statement of Overriding Considerations" before it can approve the Proposed Project. A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of the Proposed Project against its unavoidable significant environmental impacts and has determined that the benefits of the Proposed Project outweigh the adverse effects. Therefore, the adverse effects are considered to be acceptable. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after all feasible mitigation measures are applied:

5.2.1 Air Quality

- **Impact AIR-2:** Operation activities related to the Proposed Project have the potential to result in regional emission impacts. Due to the overall development intensity proposed, Project operations would generate maximum daily emissions that exceed the South Coast AQMD regional emissions thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$ even with implementation of Mitigation Measures GHG-1a through GHG-1c, and TRA-3d. Thus, impacts are considered to be significant and unavoidable.
- **Impact AIR-4:** Operation of warehousing and industrial uses accommodated under the Proposed Project has the potential to result in localized criteria air pollutant emissions impacts. These land use types could include non-stationary sources of emissions (e.g., heavy-duty trucks and off-road equipment) that could generate on-site emissions. Implementation of Mitigation Measures AIR-4a through 4c would reduce on-site emissions to the extent feasible. However, due to the programmatic nature of the Proposed Project, the amount of operation-related on-site criteria air pollutant emissions generated cannot be determined, and it is unknown whether the Proposed Project could result in generating operation-related on-site criteria air pollutant emissions that would exceed the South Coast AQMD localized significance thresholds. Thus, impacts are considered to be significant and unavoidable.
- **Impact AIR-5:** Operation of warehousing and industrial uses accommodated under the Proposed Project has the potential to result in localized toxic air contaminant (TAC) emissions impacts. These land use types could include non-stationary sources of TAC emissions (e.g., heavy-duty trucks and off-road equipment) that could generate on-site emissions. Implementation of Mitigation Measure AIR-5 would reduce on-site emissions to the extent feasible. However, due to the programmatic nature of the Proposed Project, it cannot be determined, and it is unknown whether the Proposed Project could result in generating operation-related on-site TAC emissions resulting in health risk levels that would exceed the South Coast AQMD health risk significance thresholds. Thus, impacts are considered to be significant and unavoidable.
- **Impact AIR-8:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, has the potential to contribute to a significant cumulative impact related to air quality during operation. Under South Coast AQMD methodology, project-level impacts also represent cumulative impacts. Because the Proposed Project would result in project-level emissions impacts with implementation of Mitigation Measures AIR-4a through 4c, Mitigation Measures GHG-1a through GHG-1c, and Mitigation Measure TRA-3d, the Proposed Project would result in an incremental contribution to this cumulative impact and impacts would be cumulatively considerable. In addition, Impact AIR-8 would only require implementation of the mitigation measures identified to address project-level impacts. Thus, cumulative impacts are considered to be significant and unavoidable.

5.2.2 Cultural Resources

- **Impact CUL-1:** Construction activities and the introduction of new development resulting from implementation of the Proposed Project's construction activities has the potential to result in substantial direct adverse changes to existing historical resources to remain (the Old Administration Building, Los Angeles General Hospital–Acute Unit Building, and Los Angeles General Hospital–Acute Unit Building Historic District). Incorporation of Project Design Features (PDF) 1 through 5 as part of the Proposed Project would ensure that all work within the boundaries of the Los Angeles General Hospital–Acute Unit Building Historic District would be compliant with the elements of the Secretary of Interior Standards for Treatment of Historic Properties (Standards); thus, no direct impacts to the Los Angeles General Hospital–Acute Unit Building Historic District, including the Los Angeles General Hospital–Acute Unit Building, would occur. The Proposed Project would also implement Mitigation Measures CUL-1a through CUL-1c to reduce impacts on historical resources due to the extent feasible; however, given designs for future potential projects are not known at this time, construction activities could be located outside the Los Angeles General Hospital–Acute Unit Building Historic District and may not meet all elements of the Standards, new construction activities could result in significant and unavoidable impacts to historical resources. Thus, impacts are considered significant and unavoidable.
- **Impact CUL-3:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to historical resources during construction. Construction activities associated with the Proposed Project have the potential to result in adverse changes to existing historical resources. With the incorporation of PDFs 1 through 5 and implementation of Mitigation Measures CUL-1a through CUL-1c, impacts would be reduced to the extent feasible; however, given designs for future projects are not known at this time, and may not meet all elements of the Standards, the Proposed Project impacts have the potential to contribute to a cumulative impact and impacts would be cumulatively considerable. Thus, cumulative impacts are considered to be significant and unavoidable.

5.2.3 Greenhouse Gas Emissions

- **Impact GHG-1:** The Proposed Project's construction and operational activities have the potential to result in annual GHG emissions that exceed the South Coast AQMD bright-line GHG significance threshold. Implementation of Mitigation Measures GHG-1a through GHG-1c and Mitigation Measure TRA-3d would contribute to reducing Project GHG emissions to the extent feasible. However, because the specifics of the potential future development projects accommodated under the Proposed Project are not known at this time, Project-related emissions could still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/yr. Thus, impacts are considered to be significant and unavoidable.

- **Impact GHG-2:** Construction and operation of the Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to GHG emissions. The Proposed Project has the potential to result in GHG emissions impacts, which is by its nature cumulative impact. Implementation of Mitigation Measure GHG-1a through 1c and Mitigation Measure TRA-3d would reduce Proposed Project emissions to the extent feasible. However, due to the magnitude of emissions generated by the land uses that would be accommodated by the Proposed Project, long-term GHG emissions generated from the Proposed Project could still exceed the South Coast AQMD bright-line threshold of 3,000 MTCO2e/yr. The Proposed Project would result in a contribution to this cumulative impact and impacts would be cumulatively considerable. Thus, cumulative impacts are considered significant and unavoidable.

5.2.4 Noise

- **Impact NOI-1:** The Proposed Project has the potential to result in temporary noise increases in excess of applicable standards during construction activities. Construction activities, including pile driving, associated with the Proposed project would generate noise levels that could exceed applicable construction noise thresholds at nearby receptors (off- and on-site receptors). While the implementation of Mitigation Measure NOI-1 would reduce construction noise levels, certain construction activities, including potential pile-driving, could still result in noise levels that exceed applicable thresholds. Because the potential for pile-driving exists and construction noise impacts cannot be reduced to a less-than-significant level with mitigation, impacts would be significant and unavoidable.
- **Impact NOI-2:** The Proposed Project's operational traffic has the potential to result in a substantial increase in ambient noise levels, specifically, along the segment of Marengo Street between Lord Street and State Street. The Proposed Project is anticipated to result in a 3 dBA CNEL noise increase in an ambient environment of 65 dBA or greater. No feasible mitigation measures have been identified that would reduce the Proposed Project's operational traffic noise. Impacts would be significant and unavoidable.
- **Impact NOI-4:** The Proposed Project's construction activities have the potential to result in groundborne vibration or noise in excess of applicable standards. The proposed heavy construction equipment would generate a maximum groundborne vibration level of 0.13 PPV at 130 feet. As it relates to vibration impacts to historic structures, Mitigation Measure CUL-1c shall be implemented, which would ensure no indirect structural damage would occur. While the implementation of Mitigation Measure NOI-4 and Mitigation Measures CUL-1c would reduce construction vibration levels, Mitigation Measure NOI-4 and Mitigation Measure CUL-1c would not reduce construction vibration impacts to a less that significant level. Impacts would be significant and unavoidable.

- **Impact NOI-5:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to construction-related noise. Mitigation Measure NOI-1 would be implemented to reduce construction noise levels; however, certain-construction activities, including pile-driving, could still result in noise levels that exceed applicable thresholds. Because construction impacts for noise from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. Other reasonably foreseeable cumulative projects in the area could increase ambient construction noise levels. Thus, cumulative impacts are considered to be significant and unavoidable.
- **Impact NOI-6:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to operational traffic-related noise. The Proposed Project's operational traffic has the potential to result in a substantial increase in ambient noise levels, specifically, along the segment of Marengo Street between Lord Street and State Street. The Proposed Project is anticipated to result in a 3 dBA CNEL noise increase in an ambient environment of 65 dBA or greater. Traffic generated by other cumulative development in the area would also contribute to ambient traffic noise levels. Because the Proposed Project's incremental traffic noise increase would be perceptible and would occur in an area where ambient noise levels already exceed applicable thresholds, the Proposed Project's contribution to cumulative traffic noise impacts is considered cumulatively considerable. Thus, cumulative Impacts would be significant and unavoidable.
- **Impact NOI-7:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to construction-related vibration. The Proposed Project's construction activities would result in cumulative impacts related to the generation of groundborne vibration or noise in excess of applicable standards if pile driving activities occur. While the implementation of Mitigation Measure NOI-4 and Mitigation Measures CUL-1c would reduce construction vibration levels, Mitigation Measure NOI-4 and Mitigation Measure CUL-1c would not reduce construction noise impacts to a less that significant level. Because construction impacts from the Proposed Project are significant, the Proposed Project's contribution to cumulative construction noise impacts is considered cumulatively considerable. Other reasonably foreseeable construction in the area could increase ambient construction noise levels. Thus, cumulative impacts would be significant and unavoidable.

5.2.5 Recreation

- **Impact REC-1:** Construction activities associated with the Proposed Project, including the Proposed Project's on-site recreational facilities, would have the potential to result in adverse effect on air quality, noise, and traffic. The Proposed Project would incorporate Mitigation Measures AIR-1a through AIR-1b, NOI-1, and NOI-4. The Proposed Project would

result in significant and unavoidable construction-related effects on the environment with respect to noise, which cannot be fully mitigated, as detailed in that technical analysis. Thus, impacts on recreational facilities are considered to be significant and unavoidable.

- **Impact REC-2:** The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to construction of recreational facilities. Because the Proposed Project's impacts related to construction activities are significant at the project-level, the Proposed Project's contribution to cumulative construction impacts I considered to be cumulatively considerable. Mitigation Measures AIR-1a through AIR-1b, NOI-1 and NOI-4, and TRA-1 would reduce impacts to the extent feasible; however, impacts would not be reduced to a less than significant level. Thus, cumulative impacts to recreational facilities would be significant and unavoidable.

5.2.6 Transportation

- **Impact TRA-3:** The Proposed Project would result in potential off-ramp queuing safety issues at four locations, specifically the I-5 Southbound Off-Ramp to Mission Road, the I-10 Westbound Off-Ramp to State Street, the I-5 Northbound Off-Ramp to Cesar Chavez Avenue, and the I-10 Westbound Off-Ramp to Soto Street. While implementation of Mitigation Measures TRA-3a through TRA-3d would reduce off-ramp queuing impacts at all locations; however, only the I-10 off-ramp to Soto Street would potentially operate within lane storage limits during both peak hours after mitigation. Thus, impacts cannot be reduced to a less than significant level. Impacts would be significant and unavoidable.
- **Impact TRA-5**: The Proposed Project, together with past, present, and reasonably foreseeable future projects, have the potential to contribute to a significant cumulative impact related to transportation hazards. Because the Proposed Project's operational traffic impacts are significant at the project-level, the Proposed Project's contribution to cumulative transportation hazards is considered cumulatively considerable. While implementation of Mitigation Measures TRA-3a through TRA-3d would reduce impacts, these mitigation measures would not reduce transportation hazards impacts to a less than significant level. Thus, cumulative impacts would be significant and unavoidable.

5.2.7 Utilities and Service Systems

- **Impact USS-1:** The Proposed Project's operational activities would result in potential water supply impacts for projects constructed after 2045. The Proposed Project assumes a phased long-term 25-year development horizon. The current 2020 UWMP projects water supplies based on population projections through 2045. The next UWMP will project water supplies through 2050. As such, it is not known whether sufficient water supplies and entitlements would exist to accommodate those projects' water demand. While implementation of

Mitigation Measure USS-1 would require the County to assess the availability of water supplies to accommodate future development with the Project Site that would be implemented beyond the year 2045, it may be determined that water supplies would not be sufficient to meet future water demands. Thus, impacts are considered to be significant and unavoidable.

- **Impact USS-2:** The Proposed Project's operational activities have the potential to result in the generation of wastewater that exceeds the capacity at existing wastewater facilities. While implementation of Mitigation Measure USS-2 would reduce sewer system capacity impacts, Mitigation Measure USS-2 would not reduce impacts to a less than significant level due to uncertainty regarding existing sewer system capacity and the extent, timing, and funding of future local utility infrastructure remains. Thus, impacts are considered to be significant and unavoidable.
- **Impact USS-3:** The Proposed Project's operational water demand impacts are significant; therefore, the Proposed Project's contribution to cumulative water demand impacts is considered cumulatively considerable. While implementation of Mitigation Measure USS-1 would reduce impacts, it would not reduce water demand impacts to a less than significant level. Thus, impacts are considered to be significant and unavoidable.
- **Impact USS-4:** The Proposed Project's operational wastewater impacts are significant; therefore, the Proposed Project's contribution to cumulative wastewater impacts is considered cumulatively considerable. While implementation of Mitigation Measure USS-2 would reduce impacts, it would not reduce wastewater impacts to a less than significant level. Thus, impacts are considered to be significant and unavoidable.

5.3 SIGNIFICANT IRREVERSIBLE CHANGES

State CEQA Guidelines (14 CCR 15000 et seq.) requires a Draft EIR to address any significant irreversible environmental changes that would result from the Proposed Project should it be implemented. Pursuant to Section 15126.2(d), significant irreversible environmental impacts could involve any of the following:

- Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- Irreversible damage from environmental accidents associated with the project;
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Proposed Project could result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

The Project Site encompasses 81.9 acres that make up a County hospital campus on various parcels of land owned by the County of Los Angeles. Existing land uses within the vicinity of the Project Site consists of a variety of uses, including County of Los Angeles/public uses, residential, commercial, industrial, medical, and institutional uses. The Project Site does not contain any natural resources and, under existing conditions, has a high demand for non-renewable resources related to energy demand and transportation.

Construction and long-term operation of the Proposed Project would require the commitment and consumption of nonrenewable and/or slowly renewable resources, including petroleum fuels and natural gas (for vehicle emissions, construction, demolition, site preparation, infrastructure upgrades, lighting, heating, and cooling, etc.) and lumber, sand/gravel, steel, copper, lead, and other metals (for building construction and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stresses would also be impacted by Project implementation, such as air quality through the combustion of fossil fuels and production of greenhouse gases and water supply through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs on-site. Additionally, the Proposed Project would place greater demands on public services (e.g., police, fire, and sewer and water services). Therefore, implementation of the Proposed Project would result in an irreversible commitment of land, energy resources, and public services. Returning the Project Site to pre-developed conditions would not be feasible given the extent of previous disturbance, the urbanization of the area, and the level of capital investment.

As described in Chapter 2, *Project Description*, of this Draft SEIR, the Project Site is currently envisioned for additional development associated with buildout of 2014 Master Plan, which would increase the demand for nonrenewable resources as detailed above. The Proposed Project would expand upon this development program and would result in a greater overall development intensity (e.g., up to approximately 8,060,978 square feet), which could increase the demand for nonrenewable resources beyond what was anticipated for the 2014 Master Plan. However, the Proposed Project would introduce a greater level of efficiency through the mitigation measures and project design features discussed throughout this Draft SEIR. As a result, the anticipated demand for nonrenewable resources under the Proposed Project would be comparable to the level of demand associated with development under the 2014 Master Plan, as the Proposed Project would continue to accommodate development proposed under the 2014 Master Plan.

5.4 GROWTH-INDUCING EFFECTS

Pursuant to Sections 15126(d) and 15126.2(e) of the State CEQA Guidelines, an EIR must discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This discussion includes consideration of whether a project would remove obstacles to growth (e.g., through the extension of infrastructure or changes in land use regulation) or otherwise encourage activities that could significantly affect the environment, either individually or cumulatively. Consistent with this guidance, the potential growth-inducing effects of the Proposed Project are evaluated through consideration of the following questions:

- 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?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this Proposed Project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this Draft SEIR.

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?

As described in Chapter 2, *Project Description*, of this Draft SEIR, the Proposed Project would involve upgrades and modifications to the existing aging Campus infrastructure to more efficiently support new and existing uses. Specifically, the Proposed Project includes improvements to the Campus utility systems, including electricity, natural gas, water, wastewater, stormwater management, and solid waste infrastructure, as well as circulation and transportation improvements such as internal pedestrian networks and service/emergency access improvements. These improvements are necessary to accommodate the phased redevelopment of the Campus, including residential, hospital, medical and general office, commercial/retail, educational, community facilities, and parking uses.

The proposed infrastructure and circulation improvements are intended to serve the Project Site, and the anticipated population, employment, and visitor demands generated by the Proposed Project, as well as to integrate with existing adjacent communities. However, these improvements are not intended to extend major infrastructure into previously undeveloped areas nor to introduce new utility or roadway capacity in locations that are not already developed or planned for redevelopment. Existing infrastructure at the Campus is already present, and construction and operation would largely involve upgrading, modernizing, or adaptively reusing existing facilities for increase efficiency.

Approval of the Proposed Project would facilitate redevelopment and continued operation of the Campus in accordance with the project objectives, including the provision of affordable housing, health care services, and community amenities. While these improvements accommodate the growth associated with the Proposed Project itself and support related County initiatives, they would not remove regulatory obstacles to growth or induce urbanization in previously undeveloped areas. Consistent with State CEQA Guidelines 15126.2(e), regarding growth-inducing impacts, the Proposed Project is not considered growth-inducing with respect to the removal of obstacles to growth, as it primarily supports development already envisioned in the 2014 Master Plan and maintains consistency with the County's land use and planning policies for the Project Site.

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

Direct growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. The extension of such infrastructure into a non-serviced area can represent the elimination of a growth-limiting factor, thereby inducing growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities and ultimately resulting in an increase in the pace of development or the density of the existing surrounding development. Indirect growth inducing impacts include an increased demand for housing, commodities, and services that new development causes or attracts by increasing the population or job growth in an area.

As discussed in Section 3.13, *Public Services*, of this Draft SEIR the Proposed Project would increase the demand for public services (police and fire), however the demand would be within the service capacities of these public services, particularly when coupled with the on-site dedicated security that would be provided as part of the Proposed Project. Therefore, the Proposed Project would not necessitate the construction of new or expanded public service facilities in order to maintain desired levels of service. The Proposed Project would not, therefore, have significant growth-inducing consequences with respect to public services. This would be consistent with the findings of the 2014 Master Plan EIR.

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

During Project-specific construction, several design, engineering, and construction-related jobs would be created, which would last until Proposed Project-specific construction was completed. This would provide economic stimulus in the area; however, these jobs would be filled by existing residents of the Los Angeles region and would not be substantial enough to foster other activities that would have significant effects on the environment.
The Proposed Project would result in the addition of up to 8,000 new residents and 7,482 new employees on-site. However, as discussed in Section 3.12, *Population and Housing*, of this Draft SEIR this proposed increase in employees, population, and housing is within the SCAG forecasts for the City of Los Angeles and County of Los Angeles. The increase in population anticipated on the Project Site represents approximately 2 percent of the projected population growth for the City. Additionally, as estimated, the increase in employment opportunities anticipated on the Project Site represents approximately 5 percent of the projected employment opportunity growth for the City.

Additionally, the majority of the anticipated employment positions are typical of the existing employment on the Project Site and within the City, and are associated with residential, commercial, and medical uses. These types of jobs are commonly available throughout the Los Angeles regional labor market and would be expected to be filled by the existing labor force within the City. Because the Proposed Project would not create a substantial number of unique or specialized employment opportunities that are not already available in the Los Angeles region, the Proposed Project would not be expected to induce population growth by attracting new workers to relocate to the area. An objective of the Proposed Project is to promote economic and workforce development that benefits the surrounding community. It is expected that, given its location in the highly urbanized part of Los Angeles, qualified area residents would fill the majority of additional employment positions. Similarly, it is anticipated that either local construction workers would fill the positions or construction employees would commute from elsewhere in the Los Angeles region, rather than relocate to the Project area for a temporary construction job. Nonetheless, implementation of the Project may result in the creation of indirect and induced jobs. Indirect jobs are those that would be created when goods and services are purchased from businesses in the region, and induced jobs are those that are created when wage incomes of those employed in direct and indirect jobs are spent on the purchase of goods and services in the region. Although the Proposed Project would increase employment and residential capacity relative to the assumptions in the 2014 Master Plan EIR, this increase represents a small increment in the context of the City and County's overall employment base and projected regional growth. Because the Project Site is located within a fully urbanized area with existing infrastructure and services, the incremental increase in jobs and residents would not encourage or facilitate substantial new development beyond that already anticipated in regional growth forecasts. Therefore, growth inducing impacts to the

environment would be less than significant, consistent with the findings of the 2014 Master Plan EIR.

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

Cities and counties in California periodically update their general plans elements pursuant to California Government Code Sections 65300 et seq., where the adoption of these types of plans do not necessarily set a precedent that could encourage and facilitate other activities that may significantly affect the environment. The Proposed Project consists of the phased redevelopment and adaptive reuse of the existing Los Angeles General Medical Center Campus, which is entirely County-owned and has already been approved for redevelopment of hospital, residential (work-force housing), office, and community uses under the 2014 Master Plan.

The Proposed Project's improvements, which include infrastructure upgrades, circulation enhancements, open space and landscaping, and building reuse, are focused entirely on supporting the Campus and its existing and projected uses. These improvements would not create new entitlements for development outside the Campus, nor would they establish a regulatory, policy, or development framework that could induce development in areas beyond the Project Site. Additionally, all proposed development is consistent with the County's applicable land use plans and the objectives of the previously approved 2014 Master Plan, ensuring that the Proposed Project would not serve as a model for new, unplanned development elsewhere.

Regulatory requirements and Project-specific mitigation measures have been identified in Sections 3.1 through 3.18, of this Draft SEIR, to ensure that implementation of the Proposed Project complies with all applicable County and relevant City plans, policies, and ordinances, as applicable, to ensure that there are no conflicts with adopted land development regulations and that environmental impacts are minimized. The Proposed Project does not propose any precedent-setting actions that, if approved, would specifically allow or encourage other projects and resultant growth to occur. This would be consistent with the findings of the 2014 Master Plan EIR.

5.5 MANDATORY FINDINGS OF SIGNIFICANCE

CEQA requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An SEIR has been prepared for the Proposed Project, which fully addresses all of the Mandatory Findings of Significance (State CEQA Guidelines 15065[a]), as described below.

1) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or**

wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number 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?

In practice, this is the same standard as a significant effect on the environment, which is defined in State CEQA Guidelines Section 15382 as "a substantial or potentially adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." This Draft SEIR in its entirety addresses and discloses all known potential environmental effects associated with the development of the Proposed Project including direct, indirect, and cumulative impacts. A summary of all potential environmental impacts, level of significance and mitigation measures is provided in Chapter ES, *Executive Summary*, of this Draft SEIR.

Specific to biological resources, the Proposed Project would implement Mitigation Measures BIO-1 through BIO-4 to reduce impacts on biological resources. With the implementation of mitigation measures, the Proposed Project impacts on biological resources would be less than significant.

As discussed in Chapter 3.4, *Cultural Resources*, the Proposed Project would result in the demolition of existing structures on the Project Site; however, none of the structures proposed for demolition are identified as historically significant. There are structures within the Project Site that are historical and the introduction of new development and construction activities associated with implementation of the Proposed Project has the potential to impact these structures. The Proposed Project would implement mitigation measures to reduce impacts on these historic resources.

Additionally, the Proposed Project would implement Mitigation Measure GEO-4, to reduce the Proposed Project's impacts on paleontological resources. With the implementation of mitigation, the Proposed Project's impacts on paleontological resources would be less than significant.

2) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Section 5.3, *Significant Irreversible Changes* of this chapter addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. As summarized under Section 5.3, implementation of the Proposed Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the Proposed Project's life. However, use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would

result from Proposed Project implementation, such changes would not be considered significant. In addition, Section 5.2, *Significant and Unavoidable Impacts*, identifies that the Proposed Project would result in both short-term and long-term significant and unavoidable impacts on the environment. Lastly, Section 5.4, *Growth-Inducing Effects*, identifies additional long-term environmental impacts associated with economic and population growth that are associated with the Proposed Project. The Proposed Project would result in an increase in employees, population, and housing on-site, but the population increase would be within the forecasts for the City of Los Angeles and County of Los Angeles.

3) Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?

Cumulative impacts are addressed for each environmental topic in Sections 3.1 through 3.18 of this Draft SEIR.

4) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This standard relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could directly or indirectly affect human beings would be possible in all of the CEQA issue areas previously listed, those that could directly affect human beings include aesthetics, air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, land use and planning, public services, recreation, transportation, utilities, and wildfire, all of which are addressed in Chapter 3, *Environmental Analysis*, of this Draft SEIR; see Table of Contents for specific section numbers. Based on the analysis in Chapter 3 and with the implementation of mitigation measures, no topic areas were determined to have a substantial adverse effect on human beings.

ALTERNATIVES CONSIDERATION

The alternatives evaluated in Chapter 4, *Alternatives to the Proposed Project*, would generally result in environmental impacts that are similar to or reduced compared to the Proposed Project due to reduced development intensity and site disturbance. None of the alternatives would result in new significant environmental effects beyond those identified for the Proposed Project, nor would they result in substantially greater growth-inducing impacts or irreversible environmental changes. Accordingly, the conclusions presented above for the Proposed Project would remain applicable or would be reduced under the analyzed alternatives.

5.6 REFERENCES

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