

1ST ADDENDUM
FINAL ENVIRONMENTAL IMPACT REPORT
OLIVE VIEW-UCLA MEDICAL CENTER
CAMPUS MASTER PLAN
(SCH No. 2016031090)

2025 MASTER PLAN REVISIONS
CONTINUUM OF CARE FACILITY

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TABLE OF CONTENTS

Section	Page
1. Introduction	1
A. Background	1
B. Purpose of this Addendum	7
C. CEQA Requirements	7
D. Mitigation Measures	9
E. Summary Comparison of Significant Impacts Identified in 2019 FEIR Compared to Impacts of 2025 Master Plan Revisions	21
F. Incorporation by Reference	21
G. Summary of Effects	21
2. Description of Currently Proposed Project	22
A. Project Location	22
B. 2025 Master Plan (Analyzed in the 2019 FEIR)	23
C. 2025 Master Plan Revisions	37
D. Implementation of Master Plan to Date	38
E. Construction Assumptions	38
3. Environmental Setting and Impact Analysis	40
A. Aesthetics	50
B. Agricultural and Forestry Resources	54
C. Air Quality	56
D. Biological Resources	63
E. Cultural Resources	73
F. Energy	76
G. Geology and Soils	79
H. Greenhouse Gas Emissions	83
I. Hazards and Hazardous Materials	86
J. Hydrology and Water Quality	92
K. Land Use and Planning	99
L. Mineral Resources	101
M. Noise	102
N. Population and Housing	106
O. Public Services	108
P. Recreation	111
Q. Transportation	113
R. Tribal Cultural Resources	117
S. Utilities	119
T. Wildfire	128
U. Growth Inducing Impacts	129
V. Mandatory Findings of Significance	131
W. Conclusion	135
4. Report Preparation	137

List of Figures

Figure		Page
1	Regional Location Map.....	26
2	Project Vicinity Map (Showing Continuum of Care Site).....	27
3	Continuum of Care and Associated Parking Site Plan.....	28
4	Aerial View of Continuum of Care Site.....	29
5	View North from Bucher Avenue of Continuum of Care Building Site.....	30
6	View East from Western End of Parking Site.....	31
7	View East along Hillside Drive of Continuum of Care Building Site.....	32
8	View West from Center of Continuum of Care Building Site.....	33
9	View South from Center of Continuum of Care Building Site.....	34
10	View North from Hillside Drive North of Continuum of Care Building Site.....	35
11	2019 Master Plan Site Plan.....	36
12	Vegetative Communities Mapped in Final EIR in Proximity to Continuum of Care Site.....	64
13	View of Drainage Emerging from Under Hillside Drive Continuum of Care Building Site.....	68
14	View of Drainage Northern Portion of Continuum of Care Site where it Enters Pipe.....	69

List of Tables

Table		Page
1	Adopted Mitigation Measures.....	9
2	Summary of 2019 Master Plan Land Uses.....	25
3	Summary of Impacts – Final EIR Compared to Impacts of the 2025 Master Plan Revisions.....	42

Appendices

A1	Biological Resources Memorandum
A2	Protected Tree Report
B	Traffic Memorandum

1. INTRODUCTION

A. BACKGROUND

History

The Olive View–UCLA Medical Center is the only County-sponsored hospital option in northern Los Angeles County and currently serves the residents in the San Fernando and Santa Clarita Valleys. It has played an active and integral role in the health of Los Angeles County since the mid-1900s, increasing its presence and services as the need for quality health care grew with the county’s population.

The anticipated increased demand for health care services and resulting challenges facing the campus, as well as other county hospitals, will be even greater than private-sector hospitals because of the Olive View–UCLA Medical Center’s role as a safety-net hospital.

In January 2014, the County of Los Angeles (County) began preparing the Olive View–UCLA Medical Center Campus Master Plan Report, which summarized the research, findings, observations, and proposals for master planning options at the Olive View–UCLA Medical Center and identified seven principles to determine the quality and effectiveness of the different options. Five Master Plan options were developed, which were based on an evaluation of the existing site, understanding of proposed program development, input from community residents and County stakeholders, and vision for the site. A preferred Master Plan option, the Nature’s Edge option, was subsequently selected based on community input; the “Nature’s Edge” option became the proposed project evaluated in the Final EIR (see below). In 2018 and 2019, the 2019 Master Plan figures were updated to reflect the inclusion and development of the proposed Restorative Care Village.

Final EIR

The Los Angeles County Board of Supervisors (Board), acting on behalf of the County, certified on October 15, 2019, the Olive View-UCLA Medical Center Campus Master Plan Final Environmental Impact Report (Final EIR), State Clearinghouse Number 2016031090.

The Final EIR includes a revised version of the Draft EIR, Appendices, Comments and Responses to Comments. The Board approval package for the Final EIR included a Mitigation Monitoring and Reporting Program (MMRP), the CEQA Findings and Facts in Support of Findings for the Final EIR (Findings), and a Statement of Overriding Considerations (see below for further discussion of the MMRP, Findings and Statement of Overriding Considerations).

In taking action on the Olive View-UCLA Medical Center Campus Master Plan (2019 Master Plan) in October 2019, the Board did the following:

- Determined that the Final EIR was completed in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.), pursuant to Section 15090 of the *State CEQA Guidelines*;
- Made Findings for each of the significant effects identified in the EIR and adopted a Statement of Overriding Considerations;
- Adopted the MMRP pursuant to Section 15091, determined in a statement of overriding considerations that the project benefits outweigh the project's unavoidable adverse environmental impacts; and
- Approved the project (i.e., Olive View-UCLA Medical Center Campus Master Plan) pursuant to Sections 15092 and 15093 of the *State CEQA Guidelines*.

A Notice of Determination for the 2019 Master Plan and EIR was filed with the County Clerk and State Clearinghouse on October 17, 2019.

The Final EIR evaluated two tiers of development:

- Tier I comprised of near-term projects to be developed through the year 2035. Tier I development, was anticipated to include a Restorative Care Village, consisting of a Recuperative Care Center, Residential Treatment Program facility, Mental Health Wellness Center, and a new Mental Health Urgent Care Center (MUCC), as well as the Ambulatory Care Center (ACC), Community Center, improvements to the existing hospital, new parking facilities, and other campus improvements that would be located predominantly in the eastern half of the current campus.
- Tier II development was anticipated to occur beyond 2035 and to include the construction of a new inpatient hospital, Long-Term Care facility, support services building, retail space, County department buildings, and the renovation and reuse of the existing inpatient hospital for other purposes.

Build-out of the campus under the 2019 Master Plan was anticipated to result in a net increase in building square footage of approximately 1.3 million square feet, throughout the campus. The 2019 Master Plan is discussed in more detail in **Section 2** of this Addendum.

Tier I was evaluated at a project level of detail while Tier II was evaluated at a programmatic level. The 2025 Modified Project represents a change to Tier I to include an additional building complementary to other mental health facilities in Tier I as well as associated parking.

The 2019 FEIR is a Program EIR and indicates (on page 1-5):

Subsequent activities (or projects) in the program or plan requiring further discretionary approvals would be examined in light of the program EIR to determine whether an additional environmental document should be prepared, as well as the appropriate format for the documentation. If the lead agency finds that the subsequent activity or project would not result in new effects or require new mitigation measures, the lead agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. If an EIR is required for a subsequent activity, the subsequent EIR can focus solely on new effects that were not considered in the program EIR.

The Board determined, based on the Final EIR, that the 2019 Master Plan would have the following types of impacts:

- **No impacts:** Biological Resources (Tier I and II construction and operation – conservation plan), Cultural Resources (historical resources Tier I and II construction and operation archeological resources and human remains Tiers I and II operation), Geology and Soils (Septic Tanks – Tiers I and II construction and operation, Paleontological Resources Tiers I and II operation), Hazards and Hazardous Materials (Routine Transport Tiers I and II construction and operation, accidental release and hazards to schools Tiers I and II operation), Land Use and Planning (Conflict with Plans Tiers I and II construction and operation), Noise and Vibration (Vibration Tiers I and II operation, Airstrip Tiers I and II construction and operation), Population and Housing (Displacement of Housing and People (Tiers I and II construction and operation)). The NOP/IS identified the project would have no impact on the following resource areas: Agriculture and Forestry Resources and Mineral Resources.
- **Less than significant impacts:** Aesthetics (scenic resources, visual character, light and glare Tiers I and II construction and operation; Cumulative), Air Quality (Obstruct Air Quality Plan and Odors Tiers I and II construction and operation, Sensitive Receptors Tier I construction and operation, Violate Standards Tiers I and II operation), Biological Resources (Species, Wildlife Corridors, Local Policies, Riparian Habitat Tiers I and II operation; Wetlands Tiers I and II construction and operation, Cumulative), Energy (Consumption and Local Plans Tiers I and II construction and operation) Geology and Soils (Policies Tiers I and II construction and operation), Hazards and Hazardous Materials (routine transport Tiers I and II construction and operation, Upset and Hazardous Sites Tiers I and II operation, Emergency Response Tier I and Tier II construction and operation, Cumulative), Hydrology (Water Quality Standards, Groundwater Supplies Tiers I and II operation, Drainage /Flooding and Stormwater Runoff Tiers I and II construction and operation), Noise (Cumulative), Population and Housing (Growth Tiers I and II construction and operation, Cumulative), Recreation (Increase Use of Existing, Require Construction of New Tiers I and II construction and operation), Transportation/Traffic (Conflict with Plan and Conflict with CEQA Tiers I and II construction and

operation, Design Feature Hazards and Emergency Access Tiers I and II operation), Tribal (Tiers I and II operation), Utilities (Exceed Capacities for Water Treatment and/or Wastewater Treatment, Drainage, Electricity, Natural Gas, Telecommunications; Water Supplies, Wastewater Treatment Provider, Generation of Waste Tiers I and II construction, Compliance with Solid Waste Regulations Tiers I and II construction and operation), Wildfire (Emergency Response Plan Tiers I and II operation).

- Impacts for which mitigation measures will reduce project-specific impacts to less-than-significant levels:** Air Quality (violation of standards Tier I construction), Biological Resources (migratory wildlife and local policies Tiers I and II construction), Cultural Resources (archaeology and human remains Tiers I and II construction, Cumulative), Geology and Soils, Hazards (Earthquake, Liquefaction and Expansive Soils Tiers I and II construction and operation; Soil Erosion and Paleontological Resources Tiers I and II construction, Cumulative), Hazards and Hazardous materials (Upset and Hazardous Materials Sites Tiers I and II construction), Hydrology (Water Quality Standards, Drainage, and Degrade Water Quality Tiers I and II construction; Groundwater Supplies Tiers I and II construction and operation), Noise (Ambient Noise Tiers I and II operation), Public Services (police and fire Tiers I and II construction), Transportation/Traffic (emergency access Tiers I and II construction), Utilities (water supplies Tiers I and II construction, wastewater treatment Tiers I and II construction and operation), Wildfire (Cumulative).
- Impacts for which mitigation measures will reduce impacts, but not feasibly or effectively to less-than-significant levels (significant and unavoidable):** Air Quality (Tier II construction and Tier II operation), Greenhouse Gas emissions (construction and operation, Tier I and Tier II), Noise and Vibration (construction Tier I and Tier II), Utilities (Tier II demand for water beyond 2040, Tier II waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging and cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity). In addition, Transportation impacts to delay at local intersections for Tier II operation were tentatively identified as potentially significant and unavoidable. Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on Vehicle Miles Traveled (VMT). The project site is served by two local Metro bus lines and an LADOT express bus; these facilities are anticipated to assist in reducing vehicle trips now and in the future.

Mitigation Monitoring and Reporting Plan

The adopted MMRP, identified the party responsible for implementing each mitigation measure (the County of Los Angeles for all, and in addition its contractors for some), the implementation phase (pre-construction, construction, design, etc.); the party responsible for monitoring (in all cases, the County of

Los Angeles and experts as applicable); the monitoring activity/period/frequency and any need for outside agency coordination.

CEQA Findings and Facts

The 2019 Board approval included the Findings, pursuant to PRC Section 21081 and *State CEQA Guidelines* Section 15091 and provided specific information regarding the significant environmental effects associated with the 2019 Master Plan. The document identified three possible findings, as follows, and rationale for each finding:

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

The Findings provided evidence to support the conclusions regarding each environmental impact evaluated in the Final EIR, identified significant effects that cannot be mitigated to below the level of significance, and provided findings for each of the alternatives considered in the Final EIR. The Findings identified potentially significant impacts for Air Quality (violation of standards Tier I construction), Biological Resources (migratory wildlife and local policies Tiers I and II construction), Cultural Resources (archaeology and human remains Tiers I and II construction, Cumulative), Geology and Soils, Hazards (Earthquake, Liquefaction and Expansive Soils Tiers I and II construction and operation; Soil Erosion and Paleontological Resources Tiers I and II construction, Cumulative), Hazards and Hazardous materials (Upset and Hazardous Materials Sites Tiers I and II construction), Hydrology (Water Quality Standards, Drainage, and Degrade Water Quality Tiers I and II construction; Groundwater Supplies Tiers I and II construction and operation), Noise (Ambient Noise Tiers I and II operation), Public Services (police and fire Tiers I and II construction), Transportation/Traffic (emergency access Tiers I and II construction), Utilities (water supplies Tiers I and II construction, wastewater treatment Tiers I and II construction and operation), Wildfire (Cumulative). Feasible mitigation was identified to reduce these effects to levels considered less than significant. The Findings identified the following impacts as remaining significant even after mitigation: Air Quality (Tier II construction and Tier II operation), Greenhouse Gas emissions (construction and operation, Tier I and Tier II), Noise and Vibration (construction Tier I and Tier II), Utilities

(Tier II demand for water beyond 2040, Tier II waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging and cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity).

Statement of Overriding Considerations

Effects that could not be reduced to less-than-significant levels were addressed in the Statement of Overriding Considerations. For these significant and unavoidable impacts identified in the Findings, the Board determined that economic, legal, social, technological, and other considerations for the 2019 Master Plan outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified the following specific benefits the Board considered in its decision to approve the project:

1. Implementation of the proposed project would best meet the County's anticipated needs at the Olive View – UCLA Medical Center campus.
2. Implementation of the proposed project would provide the facilities and campus infrastructure necessary to meet the community's increasing health needs and demands, optimize the quality of care, and improve operational effectiveness, including reducing administrative, operational, and maintenance costs.
3. Implementation of the proposed project would result in the development of urgently needed facilities and supportive services to the County's most vulnerable populations, such as those suffering from mental illness, addiction, or physical disabilities, to ensure a seamless transition upon discharge to home or other housing options and help patients avoid cycling in and out of emergency interventions, while reducing morbidity and costs.
4. Adherence to the Master Plan's building, landscaping, lighting, and signage design guidelines during development of projects under the Master Plan would improve the visual appearance of the campus, improve wayfinding for visitors and employees, and would make the campus more accessible to the surrounding community.
5. Implementation of the proposed project would provide new recreational and open space areas on the campus, including pedestrian and equestrian trails, which would benefit on-campus employees, visitors, and members of the surrounding community.
6. Implementation of the proposed project would replace buildings and underused space with new buildings and space that would meet seismic and fire safety requirements while also achieving sustainability initiatives.

7. Implementation of the proposed project would demonstrate sustainable design and development programs to enhance the long-term social value of the campus by designing for pragmatic long-term operations, promote efficient energy and water use, and implement LEED and CAL Green Program goals.
8. Construction of new development and campus infrastructure improvements under the proposed project would result in new construction jobs and buildout of the proposed Master Plan would result in an increase in the number of employees on the campus. Increased short-term and long-term employment opportunities would provide economic benefits to the surrounding community and the region.

B. PURPOSE OF THIS ADDENDUM

The purpose of this first Addendum is to provide environmental analysis and to document that the currently proposed revisions to the Olive View-UCLA Medical Center Campus Master Plan (2025 Master Plan Revisions) would not result in substantial changes to the approved project (the 2019 Master Plan) or to the circumstances under which it is being undertaken due to any significant environmental impacts that were not identified in the original Final EIR, or result in substantially more severe environmental effects. This document has been prepared in accordance with CEQA, specifically *State CEQA Guidelines* (Title 14, Cal. Code Regs., 15000 et seq.) Sections 15162 and 15164. The 2025 Master Plan Revisions are limited to the proposed Continuum of Care facility and associated surface parking; the remainder of the Campus would continue to be developed generally as described in the 2019 Master Plan. It is anticipated that other components of the Master Plan on the remainder of the Campus will be refined as part of the design process for each building and County-determined need, however, only the 2025 Master Plan Revisions are addressed in this Addendum.

C. CEQA REQUIREMENTS

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

According to Section 15164(a) of the *State CEQA Guidelines*, “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum shall be prepared if some changes or additions are necessary but none of the conditions in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred (see below). A

brief explanation of the decision not to prepare a subsequent EIR must also be provided in the addendum, findings or the public record.

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

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously determined not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

- (a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
- (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

The proposed revisions to the previously approved Master Plan (2025 Master Plan Revisions) are described in **Section 2** of this Addendum. As described in **Section 2**, the 2025 Master Plan Revisions would be within the construction and operation assumptions analyzed in the Final EIR. The 2025 Master Plan Revisions have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified Olive View-UCLA Medical Center Master Plan Final EIR is the appropriate environmental documentation under CEQA for the 2025 Master Plan Revisions. **Section 3** discusses issue-by-issue how the impacts anticipated for the 2025 Master Plan Revisions would be within the previously identified impacts analyzed in the Final EIR. The MMRP adopted with the Final EIR would continue to apply to the 2025 Master Plan Revisions to ensure that all significant impacts remain less than significant where it is feasible to mitigate such impacts.

D. MITIGATION MEASURES

The 2019 FEIR identifies mitigation measures that would reduce the potentially significant impacts of the 2019 Master Plan. These mitigation measures were adopted as part of the 2019 Master Plan approval process and are listed in **Table 1**. No changes are necessary or are proposed to the measures as adopted. These mitigation measures will continue to be implemented as applicable and appropriate to the revised activities that are the subject of this Addendum.

Table 1
Adopted Mitigation Measures

Topic	Mitigation Measures
Air Quality	<p>MM-AQ-1: To reduce VOC emissions during construction, the County (or its contractors) will use low-VOC coatings that go beyond the requirements of SCAQMD Rule 1113 and have a VOC content of 25 grams per liter (g/L) or less during construction of Tier I projects.</p> <p>MM-AQ-2: To minimize particulate matter and NOx emissions during construction of Tier I projects, the County (or its contractors) will use off-road equipment that meets or exceeds U.S. Environmental Protection Agency Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, CARB certified Level 3 Diesel Particulate Filter (DPFs) or equivalent.</p>

Topic	Mitigation Measures
	<p>MM-AQ-3: In the event that construction- period emissions under Tier II exceed regional or localized emissions standards in effect at the time that Tier II project details are known, the County (or its contractors) will implement the following measures to achieve emissions reductions:</p> <ul style="list-style-type: none"> • For exceedances of particulate matter or NOX regional or localized significance thresholds, the County (or its contractors) shall: <ul style="list-style-type: none"> ○ Use off-road equipment that meets or exceeds U.S. Environmental Protection Agency Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during all phases of construction. ○ Outfit all off-road equipment with Best Available Control Technology (BACT) devices including, but not be limited to, CARB certified Level 3 Diesel Particulate Filters (DPFs) ○ Require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil and aggregate import/export) that meet CARB’s 2010 engine emission standards of 0.01 gram per brake horsepower-hour (g/bhp-hr) of PM and 0.20 g/bhp-hr of NOX emissions or newer, cleaner trucks; and ○ In recognition that the Tier II developments would occur after 2035 and that more effective measures would likely be available at that time to reduce pollution emissions, the County (or its contractors) will implement all other current and feasible mitigation that are readily available for deployment at the time a Tier II project’s details are known, which may include, but is not limited to, the use of construction equipment with the latest emission control systems/technologies that would result in emission reductions exceeding those achieved by presently available technologies (e.g., Tier 4 off-road equipment and 2010 model year or newer trucks). Such technologies may include zero-emission or near-zero off-road and on-road equipment that are readily available in the SCAB. To stay abreast of the latest available mitigation, the County will conduct a review of SCAQMD’s Air Quality Analysis Handbook website on an annual basis to ensure that recommended mitigation measures by the District are considered for each future discretionary project.
	<p>MM-AQ-4: Prior to issuance of a grading permit for new individual projects occurring under the Tier II development phase that are one acre or larger, the County shall conduct an air quality analysis of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily grading activities for the proposed development. If the localized air quality analysis shows that emissions would exceed SCAQMD’s air quality CEQA localized thresholds for those emissions, mitigation identified in MM-AQ-3 shall be implemented and/or the maximum-daily grading activities of the proposed development shall be limited to the extent feasible.</p>
	<p>MM-AQ-5: In the event that operational emissions under Tier II exceed regional or localized emissions standards in effect at the time that Tier II project details are known, the County (or its contractors) will implement the following to achieve emissions reductions upon construction:</p>
	<ol style="list-style-type: none"> 1. Increase energy efficiency by at least 10 percent beyond the Title 24 standard in place at the time of construction, unless demonstrated to be infeasible. 2. Utilize low VOC coatings (VOC content less than or equal to 25 grams per liter) for periodic painting and facility upkeep. 3. Install solar water heaters. 4. Maximize interior day light and utilize high efficiency lighting. 5. Increase roof/ceiling insulation beyond the American Society of Heating, Refrigeration and Air Conditioning Engineers Standard 90.1-2010. 6. Install weather-based irrigation controllers to reduce outdoor water consumption. 7. Implement travel demand reduction measures (TDM) for employees, including, but not necessarily limited to measures such as: <ul style="list-style-type: none"> ○ Providing bicycle parking for at least five percent of full-time-equivalent campus employees. ○ Providing preferential carpool spaces within proposed parking structures on the campus. ○ Provide shuttles for visitors and employees from Metrolink and/or Metro Rail stations to reduce vehicle trips. 8. Incorporate onsite renewable energy production, including installation of photovoltaic cells or other options.

Topic	Mitigation Measures
	<p>9. The County will give preference to vendors that use zero-emission and near-zero emission on-road haul trucks in their vehicle fleet as opposed to diesel-powered trucks.</p>
<p>Biological Resources</p>	<p>MM-BIO-1: Prior to the commencement of construction activities, a habitat assessment will be done by a qualified bat biologist to identify buildings within the project area that are suitable roosting habitat for bats. The following measures would apply to structures:</p> <ul style="list-style-type: none"> • To avoid impacts to roosting bats, preconstruction surveys will be conducted prior to work occurring within the vicinity of, or removal of, vacant buildings. A qualified bat biologist will be retained to conduct bat and bat roosting site surveys between May 1 and July 30 prior to commencement of construction activities. This pre-construction survey will be conducted at the non-vacant and vacant buildings determined to be potentially suitable for roosting bats. The survey must occur during maternity season to confirm whether Townsend’s big-eared bat is present in the vacant buildings, the only locations with potential for this species. The survey at the buildings will involve exit counts and acoustic surveys to determine whether a structure supports a nursery or roost and by which species. For the non-vacant buildings, a structure inspection will be performed by a bat biologist to look for bat sign (e.g., guano, wall streaking). <p>Preconstruction bat surveys will include evening emergence surveys performed at dusk using active full spectrum acoustic monitoring. Work will be performed by qualified biologists who have knowledge of the natural history of the bat species that could occur in the project area and experience conducting surveys and using full spectrum acoustic equipment. During surveys, biologists will avoid unnecessary disturbance of occupied roosts. Evening (i.e., dusk) emergence surveys will consist of at least one biologist stationed on at different vantage points from the structure, watching for emerging bats from a half hour before sunset to 1-2 hours after sunset or until visibility is no longer optimal. Full-spectrum acoustic detectors will be used during emergence surveys to assist in species identification. All emergence surveys will be conducted during favorable weather conditions (i.e., calm nights with temperatures conducive to bat activity [55° F and above] and no precipitation predicted).</p> <ul style="list-style-type: none"> • If roosting sites or bats are not found, a report confirming their absence will be sent to the CDFW, and no further action will be required. • If it is determined that structures in the project area are being used by bats as roost sites, the following protective measures will be implemented: <ul style="list-style-type: none"> ○ Disturbance of maternity roosting structures or trees (e.g., structure removal, construction equipment operation near roosts, tree trimming or removal) will not occur between April 15 and the following September 15 (the maternity period) to avoid impacts on reproductively active females and active maternity roosts (whether colonial or solitary). The maternity roost will remain undisturbed from the time it is located until the following September 15 or a qualified biologist has determined the roost is no longer active. No construction work will occur at the roost or within a 100-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) until September 15. ○ Exclusion devices may be installed outside of the maternity period (i.e., between September 16 and April 14) to preclude bats from occupying buildings during construction. Exclusionary devices will only be installed by or under the supervision of an experienced bat biologist. ○ A Bat Management Plan (see MM-BIO-2) will be developed if a bat maternity roost, including Townsend’s big-eared bat, is found in the vacant building(s), no construction work within a 250-foot-wide buffer zone (or an alternative width, as determined in consultation with CDFW) will occur between April 1 and September 30. <p>MM-BIO-2: A Bat Management Plan will be developed to ensure mortality to bats does not occur. The following items will be included in the plan, at a minimum:</p> <ul style="list-style-type: none"> • For each location confirmed to be occupied by bats, the plan will provide details both in text and graphics where exclusion devices will need to be placed, type(s) of exclusion material to be used, the timing for exclusion work, and the timeline and methodology needed to exclude the bats. • Monitoring activities and schedule will be included, including frequency of monitoring, which structures would need to be monitored, and reporting requirements. • The plan will be reviewed and approved by CDFW. <p>MM BIO-3: Prior to construction of individual Master Plan projects, a jurisdictional delineation will be conducted within the project site for jurisdictional features, including wetlands. If the jurisdictional features</p>

Topic	Mitigation Measures
	<p>are not present, there is no potential for impacts to occur and no further action will be needed. If a jurisdictional feature is found within the project limits, then the following measures would be triggered:</p> <ul style="list-style-type: none"> • Full avoidance: This may be possible if the jurisdictional feature is found in portions of the project site that can be avoided. In this instance, Environmental Sensitive Area (ESA) fencing will be placed between the work area and the location of the features. A biologist will be present during the placement of the fencing. • Impact: If avoidance of jurisdictional features is not feasible, permits/agreements will be obtained from appropriate agencies (i.e., RWQCB, USACE, CDFW) prior to work within the features. <p>MM-BIO-4: The nesting season for birds will be avoided or preconstruction nesting bird surveys will be conducted if construction activities are carried out during the nesting season. To ensure compliance with the MBTA and similar provisions under Sections 3503, 3503.5, 3505, 3800, and 3801.6 et seq. of the California Fish and Game Code, the County of Los Angeles, through the general contractor, will conduct all vegetation removal during the non-breeding season, between September 1 and February 14, or implement the following:</p> <ul style="list-style-type: none"> • If the removal of vegetation, demolition of buildings, or noise-generating construction activities are scheduled between February 15 and August 31, the proponent or construction contractor will retain a qualified biologist experienced with conducting nesting bird surveys who will conduct a nesting bird survey prior to the start of vegetation removal, building demolition, or noise-generating construction activities within any potential nesting habitat (i.e., all vegetation, buildings, etc.). The size of the nesting bird survey area will be determined by a qualified biologist at the time of the survey and include the entire limits of disturbance. It will also include a buffer area if deemed necessary by the biologist. The preconstruction nesting bird survey will be conducted no more than 7 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 will be necessary. • If active nests are not found, then no potential for impact to nesting birds (or raptors) will occur and no further action will be needed. • If an active nest(s) is observed, then an appropriate buffer (no-construction activity buffer) will be established by the biologist to ensure nest abandonment does not occur due to the construction activities. All no-construction activity buffer areas will be clearly demarcated in the field with stakes and flagging that are visible to construction personnel. <p>MM-BIO-5: Prior to construction of Master Plan projects that could result in tree removal or pruning, a qualified arborist will inventory native oak trees on the project site in support of an oak tree permit, if required. Oak tree permit requests require a property owner to file an application with the Department of Regional Planning and provide a filing fee, an oak tree report, site plans for the property, and maps of the surrounding area. The oak tree report will include information about the protection of oak trees that may be adjacent to construction activities that are to remain. The oak tree report will also include the proposed replanting plan, in accordance with the required replacement ratio, for any oak trees that are to be removed.</p> <p>MM-BIO-6: Prior to construction within the eastern portion of the project site that could temporarily affect California sagebrush scrub as identified in Figure 3.3-3 of the Master Plan EIR, a Habitat Mitigation Monitoring Program (HHMP) will be created. The Plan will include, at a minimum, the following requirements:</p> <ul style="list-style-type: none"> • Vegetation monitoring will be performed in the spring-summer, or as specified in the HHMP, within California sagebrush scrub habitat proposed for temporary impact. A list of the native species present will be compiled, and the absolute percent cover of each species will be estimated. This information will set the performance standards and success criteria for the HHMP. • The HHMP will provide a map showing the location of each area proposed for impact and the absolute percent cover of each native species within the impact area. • Restoration monitoring for five years or until success criteria are met with monitoring every quarter for the first two years and annually thereafter. • The monitoring will include annual vegetation sampling beginning after the first year. The sampling will occur in the window of March to June, or as specified within the HHMP. The sampling will provide absolute percent cover of native shrubs and forbs/grasses.
Cultural Resources	MM-CR-1: Train Construction Personnel. Prior to any ground disturbance activities, all construction personnel will be trained regarding the recognition of possible buried cultural and tribal cultural resources during construction ground-disturbing activities. Training will inform all construction personnel of the

Topic	Mitigation Measures
	<p>procedures to be followed upon the discovery of cultural and tribal cultural resources, including Native American burials. Training will also inform all construction personnel that unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order and that violators will be subject to prosecution under the appropriate state and federal laws, and violations will be grounds for removal from the project.</p> <p>MM-CR-2: Cultural Resources Monitoring. Cultural resources monitoring of ground- disturbing activities within undisturbed native soils will be conducted by a qualified archaeologist familiar with the types of cultural and tribal cultural resources that could be encountered within the proposed project area. The monitor will be under the direct supervision of an archaeologist who meets the national standards for archaeology as set by the Secretary of Interior’s Standards and Guidelines for Archaeology and Historic Preservation. Ground-disturbing activities include but are not limited to: auguring, excavation, geotechnical investigations, vegetation clearing, ground surface leveling, trenching, and conventional mass grading. A single monitor will be assigned to observe two or more simultaneous ground-disturbing activities that occur less than 50 feet away from each other. Additional monitors will be assigned if two or more simultaneous ground-disturbing activities occur more than 50 feet away from each other. Monitors will complete a daily monitoring activity log.</p> <p>MM-CR-3: Native American Tribal Monitoring. If intact prehistoric cultural resource deposits, as determined by the project archaeologist, and/or tribal cultural resources, in consultation with the Fernandeño Tataviam Band of Mission Indians and the County, are identified during ground-disturbing activities within native soils, Native American tribal monitoring will be conducted by a Native American monitor from the Fernandeño Tataviam Band of Mission Indians. A single tribal monitor will be assigned to observe two or more simultaneous ground-disturbing activities that occur less than 50 feet away from each other. Additional tribal monitors will be assigned if two or more simultaneous ground-disturbing activities occur more than 50 feet away from each other. The tribal monitors will represent the Tribes’ interests and will follow the Native American Heritage Commission’s Guidelines for Tribal Monitors, which will include completion of a Native American monitoring daily activity log.</p> <p>MM-CR-4: Discovery of Cultural and Tribal Cultural Resources. If cultural resources or tribal cultural resources are encountered during ground-disturbing activities, cultural and tribal monitors are empowered to divert ground-disturbing activities within 50 feet of the discovery until a qualified archaeologist can evaluate whether the resource is a unique archaeological resource or historical resource as defined in Public Resources Code Section 21083.2 and/or 14 C.C.R. Section 15064.5, or, in consultation with the Tribe, a tribal cultural resource as defined in Public Resources Code Section 21074. Work may continue in other areas. Tribal monitors will cooperate with the qualified archaeologist to locate all cultural materials exposed during ground-disturbing activities. All cultural resources recovered will be documented on California Department of Parks and Recreation Series 523 Forms.</p> <p>MM-CR-5: Treatment of Cultural and Tribal Cultural Resources. If the qualified archaeologist determines that the discovery is a historical resource (as defined in MM CR-4) of an archaeological nature, or, in consultation with the Tribe and the County, a tribal cultural resource, then the mitigation standards of 14 C.C.R 15126.4(b) which specifies that preservation in place will be the preferred manner of mitigation.</p> <p>If preservation in place is not feasible, a cultural and/or tribal cultural resources treatment plan will be prepared pursuant to 14 C.C.R 15126.4(b) and the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation. The treatment plan will include (i) provisions for assessment and treatment of the resources identified; (ii) reporting of results in a timely manner; and (iii) the opportunity for the Tribe to engage in the recovery of material and (iv) to provide comments on the draft report. The Tribe will be afforded the opportunity to review the plan prior to implementation. The plan will be submitted to the Los Angeles County Department of Public Works prior to the treatment of the historical resource, unique archaeological resource, or tribal cultural resource.</p> <p>A preliminary draft monitoring compliance report will be submitted within three months of the end of project construction activity. The report will be prepared by a qualified archaeologist and include documentation and interpretation of resources identified or recovered. Interpretation will include full evaluation of the eligibility of the resources identified for listing on the California Register of Historical Resources (CRHR). All surface and subsurface artifacts and features will be mapped and described in the report. The Tribe will be afforded the opportunity to provide comments for inclusion in the final report. The final report will be filed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. One copy of the final report will be provided to the Tribe.</p>

Topic	Mitigation Measures
	<p>MM-CR-6: Human Remains. In accordance with California Health and Safety Code Section 7050.5, if human remains are encountered no further disturbance will occur within 50 feet of the find(s) until the Los Angeles County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resource Code Section 5097.98(b) remains will be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then identify the most likely descendant(s) (MLD). The MLD will make recommendations concerning the treatment of the remains within 48 hours as provided in Public Resources Code Section 5097.98. If the County cannot come to an agreement with the MLD, Public Resources Code Section 5097.98(e) requires the County to “reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.”</p>
<p>Geology</p>	<p>MM-GEO-C1: All recommendations included in the preliminary Geotechnical Evaluation prepared for the proposed project (see Appendix F.1 of 2019 FEIR) will be followed. A detailed subsurface geotechnical evaluation will be performed to address site-specific conditions at the locations of the planned improvements and provide detailed recommendations for design and construction.</p> <p>The geotechnical evaluation will include the following measures to mitigate potential fault rupture, seismic ground shaking, ground failure, and liquefaction hazards identified under Impacts GEO-1 and GEO-2.</p> <ul style="list-style-type: none"> • <i>Fault Rupture:</i> Future geologic investigations to evaluate the location and relative activity of potentially active fault splays at the project site and the feasibility of locating future site improvements will be conducted by geologic consultants prior to design of structure locations. Fault investigations will be conducted by a California State Certified Engineering Geologist and reviewed by the CGS. Appropriate building setback zones will be established in locations deemed not feasible for construction of occupied structures. • <i>Seismic Ground Shaking:</i> Structural elements of future improvements will be designed to resist or accommodate appropriate site-specific ground motions and conform to the current seismic design standards, including those set forth by the 2013 California Building Code (CBC) and the County of Los Angeles building regulations. • <i>Ground Failure:</i> Assessment of liquefaction potential at the project site will be evaluated by subsurface geotechnical exploration prior to detailed design and construction of project improvements and will be incorporated into the design, as appropriate. Structural design will be developed to reduce the potential impacts of liquefaction, including the incorporation of techniques such as structural design, in-situ ground modification, or supporting foundations with piles at depths designed specifically for seismically induced settlement. • <i>Landslides:</i> A detailed assessment of the landslide and mudflow potential in areas of project improvements will be performed prior to design and construction of improvements and incorporated into the design, as appropriate. Methods for construction in areas with a potential liquefaction hazard may include excavation of potentially unstable material for a more stable slope configuration; reduction of landslide driving forces by removal of earth materials at the top of the landslide; construction of a buttress and/or stabilization fills; construction of retaining walls, installation of rock bolts on the face of the slope, or installation of protective wire mesh on the slope face; the construction of debris impact walls at the toe of the slope to contain rock fall debris; and/or supporting foundations with piles at depths designed specifically for seismically induced settlement. Graded slopes created for future project site developments will also be designed to reduce the potential for landslides or mudflows. <p>The geotechnical evaluation will include the following measures to mitigate unstable soil impacts identified under Impact GEO-3.</p> <ul style="list-style-type: none"> • <i>Groundwater:</i> 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 adjacent improvements and provide access for construction. All recommendations included in the preliminary geotechnical evaluation pertaining to groundwater will be followed. Onsite infiltration of storm water related to Low Impact Development guidelines will be evaluated during the detailed design phase of the project. Further study, including subsurface exploration, will also be performed during the detailed design phase of planned improvements to evaluate the presence of seepage and/or perched groundwater, and to evaluate the potential for stormwater infiltration at the site, and the potential impacts on design and construction of

Topic	Mitigation Measures
	<p>project improvements. Techniques such as casing, shoring, and/or construction dewatering will be incorporated.</p> <ul style="list-style-type: none"> <p><i>Collapsible Soils/Settlement:</i> Assessment of soil settlement will be performed prior to detailed design and construction, or project improvements and techniques will be developed, as appropriate, to reduce impacts related to settlement. Surface reconnaissance and subsurface evaluation will be performed.</p> <p>Site-specific geotechnical evaluations will also be performed to assess the settlement potential of onsite natural soils and undocumented fill, which may include drilling of exploratory borings or test pits and laboratory testing of soils, where appropriate, to evaluate site conditions.</p> <p>Examples of possible mitigation measures for soils with the potential for settlement could include 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 of new fills, and specialized foundation design, including the use of deep foundation systems to support structures. Various in-situ soil improvement techniques are also available, such as dynamic compaction (heaving tamping) or compaction grouting.</p> <p>The geotechnical evaluation will include the following measures to mitigate the expansive and corrosive soils hazards identified under Impact GEO-4.</p> <ul style="list-style-type: none"> <p><i>Expansive Soils:</i> Assessment of the potential for expansive soils will be performed during the design phase of the project through subsurface exploration and mitigation techniques such as over-excavation and replacement with non-expansive soils, soil treatment, moisture management, and/or specific structural design for expansive soil conditions will be developed, as appropriate, to reduce impacts to expansive soils.</p> <p>MM-GEO-C2: A Storm Water Pollution Prevention Program incorporating best management practices (BMPs) for erosion control will be prepared prior to the start of construction in accordance with governing agencies. Long-term erosion management practices and drainage provisions will also be incorporated into the design and maintenance of the project following development of site improvements.</p> <p>BMPs may include surface drainage measures for erosion due to water, such as the use of erosion prevention mats or geofabrics, silt fencing, sandbags and plastic sheeting, and temporary drainage devices. Positive surface drainage will be accommodated at project construction sites to allow surface runoff to flow away from site improvements or areas susceptible to erosion. Wetting of soil surfaces and/or covering exposed ground areas and soil stockpiles will also be considered during construction operations, as appropriate, to reduce wind-related erosion (see air quality impacts and mitigation measures). Project design will address reducing concentrated run-off conditions that could cause erosion and affect the stability of the project.</p> <p>MM-GEO-C3: Due to the moderate paleontological potential of the Pacoima Formation, monitoring will be conducted during all earthmoving activities affecting native sediments of the Pacoima Formation to reduce potential impacts to a less-than- significant level. Excavations will be monitored by a qualified paleontological monitor under the supervision of the qualified paleontologist.</p> <p>Additionally, periodic paleontological spot checks should initially be conducted when excavation exceeds depths of five feet into areas mapped as Quaternary alluvium to determine if older, paleontologically sensitive sediments are present. If present, full-time monitoring will be implemented.</p> <p>Monitoring may be reduced if some of the potentially fossiliferous units described herein are, upon exposure and examination by qualified palaeontologic personnel, determined to have a low potential for containing fossil resources.</p> <p>The palaeontologic monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor will 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 will be made. To prevent construction delays, paleontological monitors will be equipped with the necessary tools for the rapid removal of fossils and retrieval of associated data. This equipment will include handheld global positioning system receivers, digital cameras, and cell phones as well as a tool kit with specimen containers, matrix sampling bags, field labels, field tools (e.g., awls, hammers, chisels, shovels, etc.), and plaster kits. At each fossil locality, field data forms will be used to record pertinent</p>

Topic	Mitigation Measures
	<p>geologic data, stratigraphic sections will be measured, and appropriate sediment samples will be collected and submitted for analysis.</p> <p>Fossils collected, if any, will be transported to a paleontological laboratory for processing where they will be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility such as LACM.</p> <p>Following analysis, a Report of Findings with an appended itemized inventory of specimens will be prepared, which, when submitted to the County of Los Angeles Department of Public Works, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, will complete the program to mitigate impacts on paleontological resources.</p>
Greenhouse Gas Emissions	<p>MM-GHG-C1: The County (or its contractors) will implement the following diesel emission-reduction measures during project construction:</p> <ul style="list-style-type: none"> • All equipment and delivery truck idling times will be limited by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage will be installed at all delivery driveways and loading areas regarding the limitation on idling time. • All construction equipment will be maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction activities using diesel-powered vehicles or equipment, the County's construction contractors will verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into the project site. A report by the certified mechanic of the condition of the construction and operations vehicles and equipment will be submitted to the County prior to their use. • Alternative-fuel (e.g., biodiesel, electric, compressed natural gas) construction vehicles/equipment (comprising at least 15 percent of the fleet) will be used, to the extent feasible. • Renewable diesel fuel will be used for all diesel-powered heavy construction equipment and on-road vehicles to the extent that it is readily available from a local supplier in the Southern California region. • Local building materials (at least 10 percent) and recycled products, including cement and concrete made with recycled products, will be used, to the extent feasible. • A construction waste management plan will be implemented to divert landfilled waste by requiring the recycling of a minimum of 65 percent of all non-hazardous construction waste. <p>MM-GHG-O1: The County will implement the following greenhouse gas (GHG) reduction measures for all new development within the campus:</p> <ul style="list-style-type: none"> • The County (or its contractors) will implement the following water conservation measures, which are in addition to those required by codes and ordinances: <ul style="list-style-type: none"> ○ Install public bathroom faucet aerators (non-residential & residential over 6 stories) with a flow rate of 0.4 gallons per minute (gpm), ○ Install cooling tower conductivity controllers or cooling tower pH conductivity controllers, ○ Install rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gpm, ○ Install drip/subsurface irrigation (i.e., micro-irrigation), ○ Implement proper hydro-zoning (i.e., groups plants with similar water requirements together), ○ Install zoned irrigation, ○ Contour landscaping to minimize precipitation runoff, ○ Install drought tolerant plants in 50 percent of total new landscaping, ○ Install water conserving turf in 100 percent of new turf added to landscaping, and ○ Use recycled water for stationary equipment that requires water cooling, to the extent feasible. • Install a stormwater retention and filtration system. • Pursue a net zero water building design for new campus buildings, to the extent feasible. • Develop a recycled water strategy and implementation plan that increases the campus's use of alternative water sources, such as rainwater, greywater, stormwater, and recycled water. • Achieve a minimum solid waste diversion rate of 85 percent by 2035 by implementing measures including, but not necessarily limited, to: <ul style="list-style-type: none"> ○ Installing a food waste diversion program at the campus, ○ Installing an onsite recycling program at the campus, • Incentivize the use of recycled materials in new and renovated campus buildings • Prioritize the use of food vendors with certifications for sustainable agricultural practices related to water and energy use, to the extent feasible. • Provide plant-based menu options at new and existing campus food facilities, to the extent feasible.

Topic	Mitigation Measures
	<ul style="list-style-type: none"> • Pursue zero waste certification requirements for the campus, to the extent feasible. • Install Energy Star-rated appliances. • Install electric-only appliances and HVAC (e.g., no natural gas heating or cooling) systems, to the extent feasible. Where natural gas appliances need to be installed, these appliances will meet high-efficiency standards. • Establish an energy and water use data collection program to benchmark and report energy and water use at the campus, demonstrating an increase in energy and water efficiency over the lifetime of the project. • Implement travel demand reduction measures (TDM) for employees, including, but not necessarily limited to measures such as: <ul style="list-style-type: none"> ○ Providing bicycle parking for at least 5 percent of full-time-equivalent campus employees. ○ Providing preferential carpool spaces within proposed parking structures on the campus. • Dedicate 5 percent of new parking spaces for clean-air vehicles and equip those spaces with electric vehicle charging equipment. • Purchase new zero-emission passenger vehicles for use by the campus. • Install a high-efficiency lighting system that takes advantage of natural daylighting, augmented by daylighting controls and occupancy sensors that turn off the lights in unoccupied spaces. • Maximize the installation of solar systems on new and renovated buildings to the extent these systems are cost-effective. • Install, in proposed new buildings containing more than 10,000 gsf of space, high-performance glazing with a low solar heat gain coefficient value that reduces the amount of solar heat allowed into the building, without compromising natural illumination. • Install cool roofs with an R value (i.e., the measurement of the effectiveness of thermal insulating materials) of 30 or better on proposed new buildings, to the extent feasible. • Implement a net zero carbon building design for all new building developments and building renovations at the campus, to the extent feasible. • Develop an urban heat island mitigation strategy and implementation plan to guide all future development of the campus. • Increase urban tree canopy cover to provide shade to a minimum of 40 percent of the length of sidewalks on all campus streets. • Use electric powered landscaping equipment, rather than fossil-fuel powered landscaping equipment, to the extent feasible. • Focus selection on native plants and trees to provide new, water-wise landscaping that blends the campus with the ecology of the surrounding natural environment. • Provide ongoing sustainability education and training for campus employees.
Hazards	<p>MM-HAZ-1: Encountering Contaminated Soils. If odiferous, stained, or discolored soil is encountered near the fire station, USTs, or spray booth a professional environmental consultant specializing in the identification and handling of hazardous materials will be retained by the County to assess the site. Identification of possible hazardous materials would typically involve soil samples and laboratory analysis. The suspect soil will be isolated, covered, and avoided by construction personnel until analytical results are reviewed by qualified personnel. Soils identified as hazardous or contaminated will be handled, transported, and treated in accordance with all federal, state, and local existing hazardous materials regulations (as mentioned under Section 3.7.2, <i>Regulatory Setting</i>, of this EIR) and based on the professional environmental consultant’s recommendations. Only when the site has been released by the professional environmental consultant and the applicable oversight agencies (such as the Los Angeles County Fire Department’s Health Hazardous Materials Division) will construction activities be allowed to continue on the affected site.</p> <p>MM-HAZ-2: Engineering Controls and Best Management Practices During Construction. To minimize human exposure to potentially contaminated soils during construction, contractors will employ the use of engineering controls and BMPs. Engineering controls and construction BMPs will include, but are not limited to, the following.</p> <ul style="list-style-type: none"> • Contractor employees working on site handling potentially contaminated media will be certified in the Occupational Health and Safety Administration’s 40-hour Hazardous Waste Operations and Emergency Response training. • Contractors will water or mist soil as it is being excavated and stockpiled or loaded onto transportation trucks. • Contractors will place any stockpiled soil in areas shielded from prevailing winds or cover stockpiles with staked and/or anchored sheeting.

Topic	Mitigation Measures
	<p>MM-HAZ-3: Encountering Asbestos- Containing Materials and Lead Based Paint. In order to minimize exposure, prior to demolition activities, a Hazardous Building Materials Survey (HBMS) and evaluations for asbestos-containing materials and lead-based paint will be conducted in buildings that are to be demolished or renovated. Abatement measures will be implemented in accordance with the recommendations of these evaluations. Asbestos surveys will be conducted in accordance with SCAQMD Rule 1403, which specifies that all surveys are to be carried out by a Cal/OSHA-certified asbestos consultant and will follow established survey protocols, notification, and work practice requirements. Lead-based paint surveys will be carried out by California Department of Public Health (CDPH)-certified inspector/assessor. If necessary, a lead abatement plan would be prepared by the CDPH-certified project monitor or supervisor, and demolition activities would be performed by CDPH-certified workers.</p> <p>MM-HAZ-4: Project-Level Hazardous Materials Sites Assessment Prior to Construction Activities. To avoid exposure of construction workers, the public, or the environment to contaminated media, prior to any ground-disturbing activities, contractors will be required to retain a professional environmental consultant specializing in hazardous materials impact assessment to conduct a project-level analysis to determine if there are existing hazardous materials conditions in the vicinity of the construction site and potential for existing hazardous materials conditions to affect construction. This assessment will consist of a search for environmental-related information present in publicly accessible databases. The information will be reviewed to determine if the construction footprint or adjacent properties are listed in the databases. If the construction footprint or adjacent properties are listed in the databases, the professional environmental consultant will determine the potential risk to construction workers, the public, or the environment from rehabilitation activities and identify all necessary avoidance, abatement, remediation, cleanup, disposal, monitoring, reporting, notifications, and/or other measures to prevent significant impacts. The contractor will implement all measures as directed by the professional environmental consultant.</p>
Hydrology and Water Quality	<p>MM-HYD-C1: Where groundwater seepage could occur, permanent monitoring wells will be installed during construction within and around the perimeter of each building to monitor the groundwater level and evaluate the performance of the dewatering system. Before starting dewatering operations, a baseline conditions survey will be made of all adjacent foundations and structures to assess the impact of deep excavation dewatering on adjacent structures. All signs of existing distress will be recorded.</p> <p>MM-HYD-O1: Irrigation water demands above existing irrigation demands will be met by alternative supply sources to the maximum extent technically and financially feasible. The use of alternative water supply sources for irrigation will be maximized to reduce the use of potable water for irrigation and approximate existing irrigation demands. Alternative water supply sources include, but are not limited to, gray water and harvested rainwater (stormwater).</p> <p>MM-HYD-O2: An O&M Plan will be developed for LID features at the site during the design of the initial development projects and expanded as development progresses and different LID features are added. The plan will consider impacts on water quality and address issues related to Integrated Pest Management (IPM) or organic maintenance practices, including those for hand weeding.</p> <p>MM-HYD-O3: For any proposed LID features located within an area of potential liquefaction, structural design modifications should be included to mitigate the potential impacts of liquefaction on the performance and operation of the LID features and to maintain the water quality performance as originally design. The O&M Plan should include provision for inspection, repair, maintenance, and/or reconstruction after liquefaction events for any LID features located within an area of potential liquefaction.</p>
Noise	<p>MM-NOI-C1: Reduce Construction Noise to the Extent Possible. The County will implement the following noise reduction measures during construction:</p> <ul style="list-style-type: none"> • Construction activities will be limited to between the hours of 7:00 A.M. to 7:00 P.M. on Monday through Friday or 8:00 A.M. to 6:00 P.M. on Saturdays and will not occur at any time on Sundays or legal holidays. Construction personnel will not be permitted on the job site, and material or equipment deliveries and collections will not be permitted outside of these hours. • To the fullest extent practicable, the quietest available type of construction equipment will be used. Newer equipment is generally quieter than older equipment. The use of electric powered equipment typically is quieter than diesel or gasoline powered equipment, and hydraulic powered equipment typically is quieter than pneumatic power.

Topic	Mitigation Measures
	<ul style="list-style-type: none"> • Where possible, impact pile driving will be replaced with other piling techniques, such as vibratory pile driving, or vibration-and percussive-free methods (examples include hydraulic press-in piles or cast-in-drilled-hole piles). • All mobile and fixed noise-producing equipment used on the proposed project that is regulated for noise output by a local, state, or federal agency will comply with such regulation while in the course of project activity. • All construction equipment will be properly maintained. Poor maintenance of equipment can cause excessive noise levels. • All construction equipment, stationary and mobile, will be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc welders, air compressors) will be equipped with shrouds and noise control features that are readily available for that type of equipment. • All noisy equipment will be operated only when necessary and will be switched off when not in use. • The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only. To the extent practicable, temporary barriers will be employed around the project site and/or around noisy construction equipment. For barriers to be effective they will break the line-of site between the equipment and any noise-sensitive receiver. These barriers may be constructed as follows: <ul style="list-style-type: none"> ○ From commercially-available acoustical panels lined with sound absorbing material (the sound absorptive faces of the panels will face the construction equipment). ○ From common construction materials such as plywood and lined with sound absorptive material (the sound absorptive material will face the construction equipment). ○ From acoustical blankets hung over or from a supporting frame. The blankets will provide a minimum sound transmission class (STC) rating of 28 and a minimum noise reduction coefficient (NRC) of 0.80 and will be firmly secured to the framework with the sound absorptive side of the blankets oriented toward the construction equipment. The blankets will be overlapped by at least 6” at seams and taped so that no gaps exist. <p style="margin-left: 40px;">The largest blankets available will be used in order to minimize the number of seams. The blankets will be draped to the ground to eliminate any gaps at the base of the barrier.</p> • Construction contractors will ensure that construction employees are trained in the proper operation and use of the equipment. • Storage, staging, parking, and maintenance areas will be located away from sensitive receptors. Where this is not possible, the storage of waste materials, earth, and other supplies will be positioned in a manner that will function as a noise barrier to the closest sensitive receivers. • Stationary noise sources such as generators and compressors will be positioned as far away as possible from noise-sensitive areas. • Construction equipment will be stored on the project site while in use. This will eliminate noise associated with repeated transportation of the equipment to and from the site. • To the extent possible haul roads should not be designated through noise-sensitive areas.
	<p>MM-NOI-C2: Reduce Construction- Generated Groundborne Vibration to the Extent Possible. The County will implement the following vibration reduction measures during construction:</p> <ul style="list-style-type: none"> • Where possible, impact pile driving will be replaced with other piling techniques, such as vibratory pile driving or, preferably, vibration-and percussive-free methods (examples include hydraulic press-in piles or cast-in-drilled-hole piles). • To the extent possible, heavy construction equipment will not be operated within 140 feet of onsite or offsite sensitive receptors.
	<p>MM-NOI-O1: Design Project Facilities to Ensure All Mechanical Equipment Complies with Chapter XI of the city of Los Angeles Municipal Code. During the architectural and engineering design phase of each new facility (building, central plant, etc.) that would introduce new mechanical equipment to the project site, and prior to the issuance of any building permits for the facility, the County will retain an acoustical consultant to evaluate the design and provide recommendations, as necessary, to ensure that the mechanical equipment complies with Chapter XI of the city of Los Angeles Municipal Code. Such recommendations may include but</p>

Topic	Mitigation Measures
	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.
Public Services	<p>MM-PS-1: The Los Angeles County project manager and construction contractor will regularly notify and coordinate with the LAFD, LASD and LAPD on project construction design, activities, and scheduling, including any on and off campus street or lane closures related to the proposed developments before construction begins.</p> <p>MM-PS-2: The Los Angeles County project manager and construction contractor will continue to coordinate with LASD on project design and development under the Master Plan, to ensure LASD is able to plan and staff adequate resources to continue to serve the campus for police protection services</p>
Transportation/Traffic	<p>MM-TRAF-1: The County will develop and implement traffic control measures for Master Plan projects that would result in lane or sidewalk closures, removal of parking, or similar traffic disruptions. Temporary traffic control during construction will meet the requirements of the <i>California Manual on Traffic Control Devices (CA-MUTCD)</i>. Daytime closures will be covered by the applications shown in Chapter 6 of the manual. Overnight closures, long-term closures, and detours will require a Traffic Control Plan, which will be prepared as part of the project design package according to CA-MUTCD requirements. The Traffic Control Plan may include, but is not limited to, the elements listed below. Note that some of these elements may not be feasible or appropriate in all circumstances.</p> <p>The project-level environmental analysis will identify the appropriate measures for each project as applicable.</p> <ul style="list-style-type: none"> • Provide a roadway layout that shows the locations of construction activity and surrounding roadways to be used as detour routes, including special signage. • Establish detour routes in coordination with the city of Los Angeles to minimize disturbances to local traffic conditions; review potential detour routes to make sure adequate capacity is available. • Avoid creating additional delay at intersections that are currently operating under congested conditions either by choosing routes that avoid these locations or constructing during non-peak times of day. • Maintain access to existing residences at all times. • Work with LASD, LAFD, and LAPD to coordinate all construction-related plans and minimize disturbances to local EMS providers; ensure that alternative evacuation and emergency routes are designed to maintain response times during construction. • Provide adequate off-street parking areas at designated staging areas for construction-related vehicles. • Work with local and regional transit providers to maintain access and circulation routes to existing stops and stations during construction phases and identify appropriate detours to provide traffic rerouting during construction while minimizing disturbance to bus services. • Work with the city of Los Angeles to maintain continuity and operation of existing pedestrian and bicycle facilities during construction.
Utilities	<p>MM-UTL-1: Prior to issuance of a building permit for any future development project under the Master Plan that could result in an increase in wastewater generation, the County will 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 will be required to build a sewer line to a point in the sewer system with sufficient capacity.</p> <p>MM-UTL-2: In conjunction with preparation of a subsequent CEQA environmental document for any future individual development project under the Master Plan that is proposed in the year 2040 or beyond that is defined as a “water-demand project” in Section 15155 of the CEQA Guidelines, the County will request, pursuant to Section 15155, that the water provider determine whether the projected water demand associated with the project was included in the most recently adopted urban water management plan. If required pursuant to Section 15155 and SB 610, the County will request that LADWP prepare a water assessment for the proposed project. The County will determine, pursuant to Section 15155, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.</p>

Source: 2019 Olive View-UCLA Campus Master Plan Final EIR and Mitigation Monitoring and Reporting Program.

E. SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN 2019 FEIR COMPARED TO IMPACTS OF 2025 MASTER PLAN REVISIONS

Unavoidable significant adverse environmental impacts identified in the Final EIR are as follows: Air Quality (Tier II construction and Tier II operation), Greenhouse Gas emissions (construction and operation, Tier I and Tier II), Noise and Vibration (construction Tier I and Tier II), Utilities (Tier II demand for water beyond 2040, Tier II waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging and cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity). These impacts would remain under the 2025 Master Plan Revisions (updates to the site plan and specific construction schedule for the 2025 Master Plan Revisions). Other impacts analyzed in the Final EIR were determined to be less than significant (see **Table 3** below for a summary comparison of all impacts analyzed in the Final EIR compared to impacts with the 2025 Master Plan Revisions). As discussed in the detailed analyses below, the mitigation measures identified in the Final EIR would continue to reduce impacts with the 2025 Master Plan Revisions to a less-than-significant level for the same issues that are reduced to a less-than-significant level in the Final EIR.

F. INCORPORATION BY REFERENCE

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

1. County of Los Angeles, Olive View-UCLA Medical Center Master Plan, certified Final Environmental Impact Report, certified October 15, 2019. Referred to herein as the Final EIR [available online here: <https://file.lacounty.gov/SDSInter/bos/supdocs/141006.pdf>].

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

G. SUMMARY OF EFFECTS

Section 3 of this Addendum includes a detailed evaluation of potential changes in environmental effects associated with development of the Master Plan for each CEQA environmental issue area, organized consistent with Appendix G of the *State CEQA Guidelines*. As summarized above, impacts would either be comparable or reduced as compared to those identified in the certified Final EIR. Therefore, as discussed in this Addendum, the 2025 Master Plan Revisions would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the *State CEQA Guidelines*, and therefore an Addendum to the Final EIR is the appropriate CEQA document to address these changes.

2. DESCRIPTION OF CURRENTLY PROPOSED PROJECT

A. PROJECT LOCATION

The 230-acre Olive View–UCLA Medical Center Campus (Campus) is located at 14445 Olive View Drive on several parcels of land owned by the County of Los Angeles (see **Figure 1** and **Figure 2**). The Campus is located within the community of Sylmar, at the north end of the San Fernando Valley, in the City of Los Angeles, California. Specifically, the site is bounded by the Angeles National Forest and Wilson Canyon Debris Basin on the north, Olive View Drive on the south, Los Angeles County Flood Control District facilities and Wilson Canyon Park on the east, and Bucher Avenue to the west. Kennedy Road and Cobalt Street intersect the project site. The site is located east of the I-5 freeway and north of the I-210 freeway.

The Campus abuts the foothills of the San Gabriel Mountains, which are a part of the Angeles National Forest. Horse trails and hiking trails run along the northern edge of the campus. Predominantly single-family residential neighborhoods are located approximately 200 feet east of the campus. A mix of single-family residences (including ranch-style homes with equestrian facilities), multifamily residences, and some commercial uses are located approximately 100 feet south of the campus across Olive View Drive. Residential uses are also located approximately 900 feet west of the campus, north of the I-210 freeway. Sylmar Leadership Academy (K–8), which is the closest school to the campus, is located approximately 0.4 miles south of the campus.

The 2025 Master Plan Revisions are limited to the site of the Continuum of Care Facility and associated parking (see **Figure 2** through **Figure 4**). The site has been previously disturbed/used but not in some time, hence natural vegetation, including a number of oak trees and other protected trees/shrubs are present on the building site and associated parking site. **Figure 5** through **Figure 10** show the Continuum of Care Building site, associated parking site and surrounding areas.

B. 2019 MASTER PLAN (ANALYZED IN THE FINAL EIR)

Figure 11 shows a conceptual layout of the 2019 Master Plan analyzed in the Final EIR.

The Final EIR (pages 2-5 and 2-6) identified the following objectives of the 2019 Master Plan:

1. Provide for development opportunities that are consistent with the goals and policies of the County's General Plan.
2. Reorganize, expand, and integrate outpatient services with the specific goal of meeting the community's health needs, providing patient-centered care, and improving the operational throughput to meet increasing demands.
3. Locate inpatient and outpatient services into dedicated buildings to optimize the quality of care and improve operational effectiveness, while reducing administrative, operational, and maintenance costs.
4. Comply with the Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1983 (Senate Bill [SB] 1953) required by the Office of Statewide Health Planning and Development in order to ensure that the hospital can maintain its license as an inpatient care facility beyond the year 2030.
5. Identify feasible opportunities to exceed state energy requirements and pursue green building sustainable design to the maximum extent possible.
6. Develop resources that are consistent with the needs of the 2035 planning horizon.
7. Provide new medical facilities, including a new replacement hospital, to meet state standards and code requirements.
8. Provide integrated direct and coordinated care, including physical health, behavioral health, social, and other supportive services to the County's most vulnerable populations, such as those suffering from mental illness, addiction, or physical disabilities, in facilities located in a welcoming campus setting with green spaces to:

- a. Ensure a seamless transition upon discharge to home or other housing options, and help patients avoid cycling in and out of emergency interventions and establish a sustainable functional life;
- b. Reduce morbidity and costs, while restoring function and dignity; and
- c. Improve the quality of life for the people and communities of Los Angeles County.

The Final EIR evaluated development including construction of new and renovated medically-related office, retail, open space, and parking uses and demolition of existing buildings and structures to accommodate new development. As shown in **Table 2** (page 2-9 of the Final EIR), full build out of the 2019 Master Plan was anticipated to result in a total of 1,632,491 square feet of construction and 293,900 square feet of demolition resulting in the Campus having a total of 2,162,491 square feet of development at the end of Tier II (existing to remain plus new developed area), with the main elements being:

- Recuperative Care Village -- comprised of the 48-bed Recuperative Care Center (RCC), 80-bed Residential Treatment Program, Mental Health Urgent Care Center (MHUCC) and Mental Health Wellness Center
- Inpatient Facilities
- Outpatient Facilities
- Long-Term Care
- Medical Center Offices
- Central Utility Expansion
- Support and Materials Management
- Circulation and Access
- Parking Facilities
- Community Facilities

Major land use changes under the 2019 Master Plan are shown in **Table 2**. The table shows the uses that were on the site in 2019, uses that were proposed to be removed and the expected new uses under the 2019 Master Plan.

Table 2
Summary of 2019 Master Plan Land Uses

Building Program	Existing	Tier I (2035)		Tier II (beyond 2035)	
		Proposed Demolition	Proposed New Development	Proposed Demolition	Proposed New Development
Recuperative Care Center - 48 beds	–	–	16,356	–	–
Residential Treatment Program - Crisis Res housing - 80 beds	–	–	47,035	–	–
Mental Health Urgent Care Center	–	–	10,000	–	–
Mental Health Wellness Center	–	–	10,000	–	–
Ambulatory Care Center	–	–	296,000	–	–
Inpatient hospital	534,300	4,300	–	–	600,000
Community Center	9,300 ¹	–	20,000	9,300	20,000 ³
Central Utility Plant East Central Utility Plant West	51,000	51,000	77,000	–	77,000
Materials Management/ Supply Services	32,500	32,500	68,100	–	–
Administration ²	108,000	52,300	96,000	55,700	–
Support services buildings	16,800	16,800	–	–	–
Research and development	–	–	–	–	120,000
Long-Term Care facility	–	–	–	–	135,000
Retail	–	–	–	–	40,000
Mental health	11,000	–	–	11,000	–
Storage trailers (vacant)	61,000	–	–	61,000	–
Total Building Square Feet	823,900	156,900	640,491	137,000	992,000
Parking Facilities	Existing	Tier I	Tier I	Tier I + II	Tier I + II
Surface stalls	2,672	–	1,369	–	1,400
Stalls in structure	0	–	674	–	1,584
Surface square footage	1,256,000	–	643,400	–	658,000

Notes:

1 Existing, recently built childcare center.

2 Administration square footage to be demolished includes finance building and bungalow square footage.

3 Includes new childcare center, fitness center, and senior center.

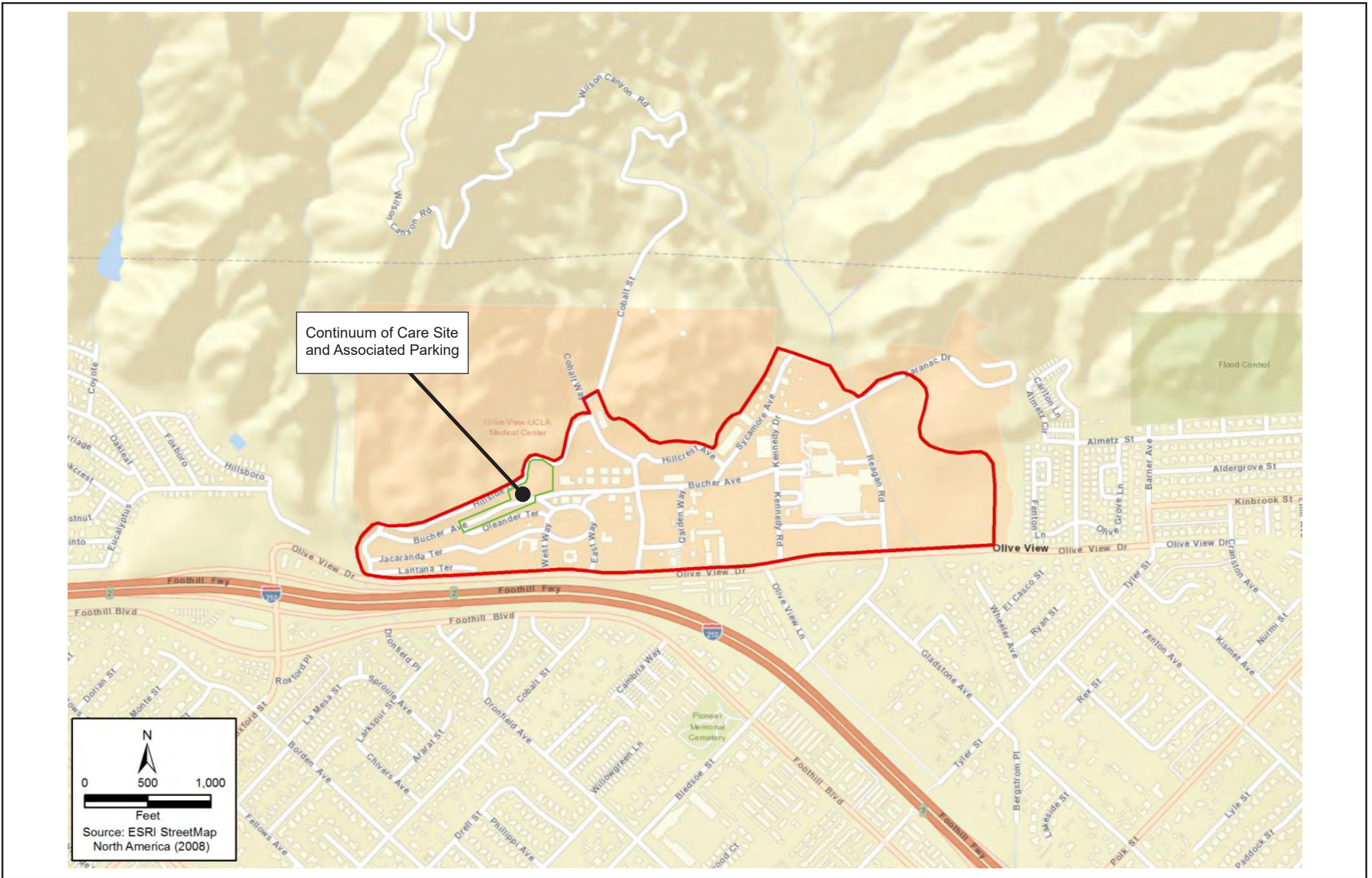
Source: ICF, Walker Consultants, County of Los Angeles 2019; SmithGroup JJR 2016; 2019 FEIR, Table 2-1 and County of Los Angeles 2025



SOURCE: County of Los Angeles, Continuum of Care Facility, Olive view UCLA Medical Center Final EIR, 2019; ICF, 2016.

FIGURE 1

Regional Location Map



SOURCE: County of Los Angeles, Olive View-UCLA Medical Center Campus Master Plan Final Environmental Impact Report, 2019. ICF International, 2016.

FIGURE 2

IMPACT SCIENCES Project Vicinity Map (Showing Continuum of Care and Associated Parking Site)



SOURCE: Google Earth, 2024.

FIGURE 3



SOURCE: Impact Sciences, 2024.

FIGURE 5



SOURCE: Impact Sciences, 2024.

FIGURE 6



SOURCE: Impact Sciences, 2024.

FIGURE 7



SOURCE: Impact Sciences, 2024.

FIGURE 8



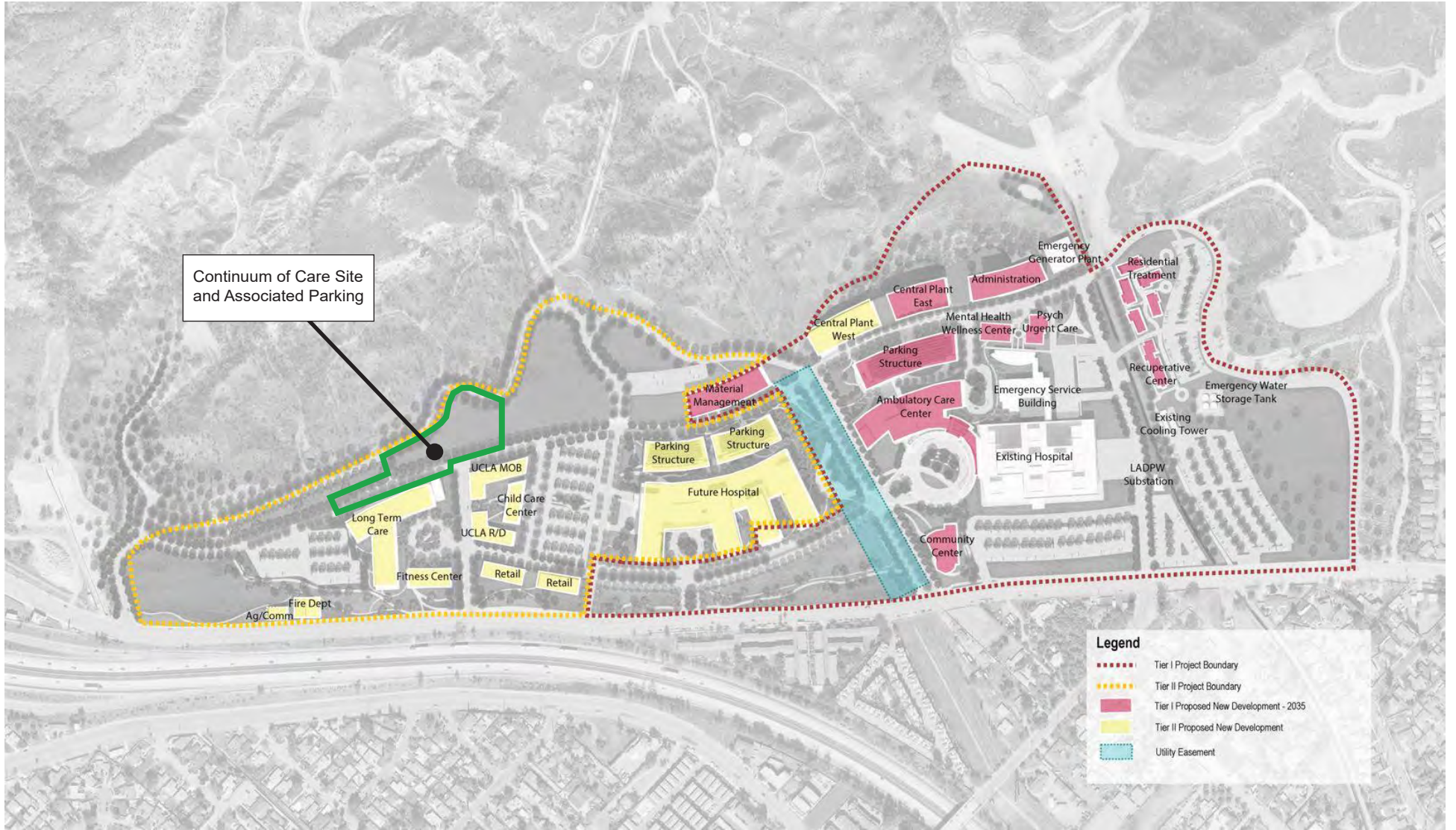
SOURCE: Impact Sciences, 2024.

FIGURE 9



SOURCE: Impact Sciences, 2024.

FIGURE 10



SOURCE: Impact Sciences, 2024; County of Los Angeles Olive View-UCLA Medical Center Campus Master Plan Final EIR, 2019; Perkins Eastman, 2019; SmithGroup JJR, 2016.

FIGURE 11

2019 Master Plan Site Plan

C. 2025 MASTER PLAN REVISIONS

The 2025 Master Plan Revisions (see **Figure 4**) are limited to the approximately 4.2-acre site proposed for the Continuum of Care facility and associated parking that would complement other Tier I mental health facilities; the remainder of the Campus would generally continue to be developed as described in the 2019 Master Plan.

The Continuum of Care facility is proposed to be a three-story approximately 55,000-square-foot building located south of Hillside Drive and north of Bucher Avenue and would contain three programs:

1. Enriched Residential Services (ERS) on the first floor would provide care for 16 patents; the average stay for patients in this program is 22 months.
2. Psychiatric Health Facility (PHF) on the second floor would provide care for 16 patients; the average stay for patients in this program is 82 days.
3. Mental Health Rehabilitation (MHRC) on the third floor would provide care for 16 patients; the average stay in this program is 18 months but can be shorter or longer.

People experiencing homelessness (PEH) will be among the clients served by the facility.

Surface parking (approximately 95 surface spaces) would be provided south of the building site across Bucher Avenue. Hillside Drive adjacent to the building site to the north would be widened to 26 feet (from the existing approximately 10 feet to 13 feet wide) and a turnaround on Hillside Drive would be provided at the northeast corner of the site; Bucher Avenue would be widened to 20 feet adjacent to the parking area (from the existing approximately about 17 feet wide).

Figure 4 shows a potential conceptual layout of the 2025 Master Plan Revisions.

The 55,000-square-foot building would have three levels, one for each of the three programs. Each floor would have a similar layout: lobby area; administration area; multi-purpose, living and group rooms, dining area, kitchen area, beds (16 on each floor, 48 total) and a nurses station. Each floor would have access to about 2,500 square feet of outdoor activity areas.

Each floor would have 36 employees for a total of 108 employees. The employees would be spread across three shifts (12 per program per shift or 36 total per shift): 7:00 A.M. to 3:00 P.M., 3:00 P.M. to 11:00 P.M., and 11:00 P.M. to 7:00 A.M. Visitors would be allowed between 9:00 A.M. and 5:00 P.M. for the PHF and MHRC programs; up to 10 visitors per day for each of these programs (20 total visitors per day to the building) are anticipated. No visitors are anticipated to the ERS program. The PHF and MHRC programs require locked facilities; visitors are only allowed in certain designated areas.

Access to the facility and to the surface parking to the south would be from Bucher Avenue including ambulance access and access to a small service yard.

The site would be landscaped providing ample opportunity for preservation of some protected trees and planting of replacement trees and would comply with applicable tree protection, preservation and replacement regulations. As part of project maintenance, trees may need to be pruned to be consistent with the proposed use.

The building would connect to City of Los Angeles utilities (electricity, water and sewer).

The building would include sustainability features and would meet LEED Gold standards.

The 2019 Master Plan shows trails and a viewpoint on the Continuum of Care site; these uses would be relocated as necessary, feasible and appropriate. The Continuum of Care building would comply with 2019 Master Plan Design, Landscaping and Lighting Guidelines as well as all applicable regulations.

D. IMPLEMENTATION OF MASTER PLAN TO DATE

The Recuperative Care Village (consisting of the 16,356-square-foot, 48-bed Recuperative Care Center; 47,035 -square-foot, 80-bed Residential Treatment Program; 10,000-square-foot Mental Health urgent care Center; and 10,000-square-foot Mental Health Wellness Center) was completed and occupied in September 2021 (a total of about 83,391 square feet).

A feasibility study for an Ambulatory Care Center, new central plant and warehouse is currently being prepared. Future funding, building sizes and construction timeframes have not yet been determined. The balance of Tier I will proceed as funding becomes available. Tier II is still considered to occur after 2035.

E. CONSTRUCTION ASSUMPTIONS

The Final EIR anticipated that Tier I construction activities on the Campus would occur initially for the Restorative Care Village over a two-year period and then other buildings over an approximately 15-year period as funds became available. The Final EIR indicates that staging areas for construction activities will be determined by the construction contractors in consultation with County staff but would likely be located on vacant parcels or existing parking lots on the Campus, in the immediate vicinity of the construction sites.

The proposed Continuum of Care Facility is planned to start construction starting in January 2026 and completed in January 2028. Construction staging would be on the site or in the immediate vicinity on vacant parcels.

The Final EIR indicated that Tier II development would be constructed beyond 2035 and could include the construction of a replacement inpatient hospital and the development of the western portion of campus. To meet projected future parking demand, two new parking structures were identified north of the new hospital. Other Tier II facilities include new research and development buildings, and a second new central utility plant. Retail building space is also identified and was noted as potentially occurring in any phase when deemed appropriate by the County. New County buildings for the Departments of Agriculture and Commerce, Fire (office space), and Sherriff were anticipated for Tier II. The fire department offices, old lab, trailers, nursing building, fitness center, warehouse, childcare center, vivarium, police department, community mental health, and administration buildings were all identified for demolition in Tier II. The Final EIR notes that Tier II would occur far in the future, and that each component is contingent upon securing necessary funding. The Final EIR further noted that the County's needs are likely to evolve over time and that schedules for the Tier II projects are not yet known.

For the purposes of the Final EIR analysis, conservative assumptions regarding construction phasing (accelerated construction and concurrent construction efforts were assumed), equipment use and trip lengths were made for purposes of evaluating air quality (noted on page 3.2-12) and noise impacts. The Final EIR noted that it is likely that construction would occur later and over a longer timeframe than evaluated in the analyses, and that the accelerated schedule overstates the level of construction activity that would occur on any given day. Also, because the analysis assumes that construction would occur earlier than the 2035 buildout date for Tier I, emissions estimates are likely overstated in that they reflect current vehicle and equipment technologies rather than cleaner technologies that are likely to be in use in future years. The construction assumptions included in the Final EIR continue to capture the maximum daily activities that would occur under the 2025 Master Plan Revisions.

3. ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

The Final EIR and the associated Findings of Fact and Statement of Overriding Considerations determined that the 2019 Master Plan would result in significant and unavoidable impacts in the issue areas identified below. **Table 3** compares impacts of the 2025 Master Plan Revisions to the conclusions of the Final EIR.

1. **Air Quality.** Tier II construction and operation. Tier II construction impacts would depend on specific project details including construction schedule and activities, advances in emissions controls and the applicable air quality thresholds. Similarly, Tier II operational impacts would depend on advances in emission controls and applicable thresholds. Because Tier II projects are expected to occur far in the future, and specific details about Tier II are unknown, emissions associated with construction and operational activities are not reasonably foreseeable. Even with the identified mitigation measures, Tier II could result in construction and/or operational emissions that could exceed regional and/or localized standards. Therefore, the Final EIR identifies Tier II air quality impacts as potentially significant and unavoidable.
2. **Greenhouse Gas (GHG) Emissions.** Tiers I and II construction and operation. GHG emissions generated during construction and operational activities for both Tier I and Tier II could exceed the 3,000 MT CO_{2e} SCAQMD suggested annual threshold. While MM-GHG-O1 would reduce the project's GHG emissions, the Final EIR could not state with certainty that emissions would be reduced below 3,000 MT CO_{2e} threshold and/or below goals of applicable regulatory programs. As such, the Final EIR identifies impacts to be significant and unavoidable.
3. **Noise and Vibration, Tiers I and II Construction.** While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts were identified as significant and unavoidable. Construction vibration impacts could significantly affect nearby noise-sensitive uses, while mitigation measure MM-NOI-C2 would reduce construction vibration levels, it may not eliminate the identified significant impacts entirely, therefore, the Final EIR identifies construction vibration impacts as significant and unavoidable.
4. **Utilities.** Tier II operation—demand for water beyond 2040, Tier II—waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging and cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity.

Proposed development under the Master Plan would increase the consumption of water. The Water Supply Assessment concluded that projected water supply during normal, single-dry, and multiple-

dry water years, as included in the 25-year projection contained in the City of Los Angeles's Urban Water Management Plan, can accommodate the projected maximum water demand associated with Tier I and Tier II development. However, the UWMP projections end in 2040, while the Master Plan is intended to provide a framework and vision for development on the Campus that could occur beyond 2040. For projects constructed in Tier II of the Master Plan, if it is determined that the water supplies are insufficient, and new offsite water infrastructure is required, the Final EIR identified a potentially significant and unavoidable impact. Similarly, development under the Master Plan would also increase wastewater flows from the Campus that would be conveyed to local sewer lines. The City of Los Angeles Bureau of Sanitation (BOS) conducted a preliminary evaluation of the project's potential impacts on existing wastewater flows, which found that based on the current approximate flow levels, the sewer system may be able to accommodate the additional wastewater flow that could occur due to new development under the Master Plan for both Tiers I and II. However, further evaluation would be needed as part of the permit process to identify a specific sewer connection point. If BOS determines that 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. Since the County cannot compel BOS to conduct further gauging and evaluation, the Final EIR, identifies impacts to local sewer lines as potentially significant and unavoidable.

5. **Transportation.** Tier II operational impacts to intersections was tentatively identified as potentially significant and unavoidable. Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on Vehicle Miles Traveled (VMT). The project site is served by two local Metro bus lines and an LADOT express bus; these facilities are anticipated to assist in reducing vehicle trips now and in the future. In the City of Los Angeles, public services are considered to be responses to development of other land uses (i.e. they provide services to people in the adjacent community and thereby shorten otherwise longer trips) and are generally presumed to have less than significant impacts.¹

The Statement of Overriding Considerations indicates that the County Board of Supervisors determined that economic, legal, social, technological, and other considerations for the 2019 Master Plan outweighed the significant and unavoidable impacts. The Statement of Overriding Considerations identified specific benefits the Board considered in its decision to approve the project (see **Section 1, Introduction**, for more details).

¹ City of Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020, page 2-7. Available online at: https://ladot.lacity.gov/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf, accessed February 25, 2025.

These overriding considerations are applicable to the 2025 Master Plan Revisions as the facilities would continue to provide all the benefits identified in the Statement of Overriding Considerations including meeting the County’s anticipated needs, supporting the County’s most vulnerable populations and providing jobs.

All remaining impacts were determined to be no impact, less than significant or less than significant with mitigation incorporated as summarized in **Table 3** below. With the 2025 Master Plan Revisions, and the mitigation measures previously included in the Final EIR, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur. Accordingly, the analyses included herein support the County’s conclusion, pursuant to *State CEQA Guidelines* Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

Table 3
Summary of Impacts – Final EIR Compared to
Impacts of the 2025 Master Plan Revisions

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Aesthetics		
Adverse effect on scenic vistas.	<i>Less than significant impact Tiers I and II, construction and operation.</i> During construction materials and activities may be visible from trails that offer sweeping views of greater Los Angeles. New Master Plan buildings would also be visible from these trails and would introduce visual changes to viewsheds and scenic vistas. I-210, is a Designated Scenic Highway in the City’s General Plan and an eligible State Scenic Highway. Views of the campus under Tiers I and II would be limited and fleeting due to the I-210’s below-grade configuration and intervening landforms and development.	<i>Less than significant impact Tiers I and II, construction and operation.</i> The three-story Continuum of Care building would be partially built within the existing hillside and would not result in substantial changes to the Campus as compared to what was evaluated in the Final EIR.
Damage to scenic resources within a scenic highway.	<i>Less than significant impact Tiers I and II, construction and operation.</i> I-210 near the proposed project site is an eligible State Scenic Highway. No off-campus improvements are proposed that could affect scenic resources within the I-210 freeway. Most mature trees would remain; however, some trees would be removed. New landscaping, including trees and other vegetation, would be provided in accordance with Master Plan landscaping guidelines to improve the appearance of the Campus.	<i>Less than significant impact Tiers I and II, construction and operation.</i> While the Continuum of Care facility and associated parking would result in the removal of some mature trees, the overall analysis of the Campus as a whole remains the same as evaluated in the Final EIR.
Degrade visual quality.	<i>Less than significant impact Tiers I and II, construction and operation.</i> Temporary presence of construction-related vehicles, equipment, barricading and cranes, etc., and construction-related excavation and grading, would result in changes to the visual	<i>Less than significant impact Tiers I and II, construction and operation.</i> The new building would comply with Master Plan design and landscaping guidelines.

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
	setting. New Master Plan buildings, landscaping, and infrastructure improvements would change the visual setting of the campus. Master Plan design and landscaping guidelines address visual quality.	
New source of substantial light and glare.	<i>Less than significant impact Tiers I and II, construction and operation.</i> Construction activities would occur during daytime and would not introduce substantial new sources of light or glare. New Master Plan development would introduce new sources of light and glare where there are numerous existing sources. The Master Plan Lighting Design Guidelines regulate light and glare.	<i>Less than significant impact Tiers I and II, construction and operation.</i> Project building and parking would comply with Master Plan Lighting Design Guidelines.
Agricultural and Forestry Resources		
Impacts to agricultural or forest resources on-site.	<i>No impact Tiers I and II, construction and operation.</i> These issues were dismissed in the Initial Study.	<i>No impact Tiers I and II, construction and operation.</i> There are no agricultural or forest resources in the project vicinity.
Air Quality		
Obstruct implementation of Air Quality Plan.	<i>Less than significant impact Tiers I and II, construction and operation.</i> The project would be consistent with the City of Los Angeles General Plan and regional plans.	<i>Less than significant impact Tiers I and II, construction and operation.</i> The project would continue to be consistent with applicable plans.
Air emissions during construction and operation – cumulatively considerable.	<i>Less than significant impact with mitigation Tier I construction; significant impact Tier II construction. Less than significant impact Tier I operation; significant Tier II operation.</i> Construction activities would increase VOC and NOx emissions. Mitigation measures would reduce emissions to less than thresholds for Tier I. Impacts of Tier II were not quantified and were found to be significant.	<i>Less than significant impact with mitigation Tier I construction; significant impact Tier II construction. Less than significant impact Tier I operation; significant Tier II operation.</i> The 2025 Master Plan Revisions could result in similar emissions during construction and would not add substantially to operational emissions. Tier II emissions remain unforeseeable and therefore considered significant.
Sensitive receptors.	<i>Less than significant impact with mitigation Tier I construction; significant impact Tier II construction. Less than significant impact Tier I operation; significant Tier II operation.</i> Mitigation would reduce emissions below localized thresholds. Impacts of Tier II were not quantified and were found to be significant.	<i>Less than significant impact with mitigation Tier I construction; significant impact Tier II construction. Less than significant impact Tier I operation; significant Tier II operation.</i> The 2025 Master Plan Revisions could result in similar emissions during construction and would not add substantially to operational emissions. Tier II emissions remain unforeseeable and therefore considered significant.
Odors	<i>Less than significant impact Tiers I and II, construction and operation.</i> Use not associated with odors. Limited duration and location of impacts during construction and regulations would result in less than significant impacts.	<i>Less than significant impact Tiers I and II, construction and operation.</i> No change in impacts compared to 2019 Master Plan.
Biological Resources		
Impact on habitat of protected species.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation.</i> Removal of buildings could impact rooting habitat for two bat species. Construction on the eastern Campus could impact gnatcatcher habitat. Mitigation would address these impacts.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation.</i> The 2025 Master Plan Revisions changes would not create any additional impacts.

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Impacts to riparian and other sensitive areas and wetlands.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact with mitigation Tiers I and II operation. There are a number of drainages that cross the Campus. Mitigation would address potential impacts.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact with mitigation Tiers I and II operation. There is a drainage that crosses the Continuum of Care site that would be avoided. Mitigation would address potential impacts.</i>
Interfere with movement of migratory species or wildlife corridors.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Impacts to roosting bats; migratory birds have the potential to nest on the site in ornamental vegetation. Mitigation would address these impacts.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Compliance with mitigation would address potential impacts.</i>
Conflict with local policies protection biological resources.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Native oaks and other protected species are present on the site; mitigation and regulatory requirements would address potential removal.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. A number of protected species are present on the Continuum of Care site; mitigation and regulatory requirements would address impacts.</i>
Cultural Resources		
Impacts to historical resources (built environment).	<i>Less than significant impact Tiers I and II, construction and operation. No known historical resources present on the Campus.</i>	<i>Less than significant impact Tiers I and II, construction and operation. No known historical resources present on the Campus.</i>
Archaeological Resources and human remains impacts.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Ground disturbing activities during construction have the potential to impact previously unidentified buried resources and remains. Mitigation would address.</i>	<i>Less than significant impact with mitigation. Same impacts and mitigation as Final EIR.</i>
Energy		
Wasteful, inefficient or unnecessary energy consumption.	<i>Less than significant impact Tiers I and II, construction and operation. The 2019 Master Plan included energy-efficient project design features and plans for solar electric power, solar thermal and hot water, as well as ground- source heating for various facilities. These efforts, combined with compliance with Title 24's energy conservation standards for new construction would help to offset increases. Energy use would not be inefficient or wasteful nor would it conflict with or obstruct Renewable energy or energy efficiency plans.</i>	<i>Less than significant impact Tiers I and II, construction and operation. The 2025 Master Plan Revisions continue to include green building measures that would ensure efficient energy use including design to LEED Gold standards.</i>
Geology and Soils		
Expose people or structures to risks as a result of seismic hazards.	<i>Less than significant impact with mitigation Tiers I and II, construction and operation. The Campus is located in the vicinity of faults and was subjected to substantial surface rupture in 1971; the area is susceptible to landslides, mudflows and slope instability. Mitigation measures would address site conditions.</i>	<i>Less than significant impact with mitigation Tiers I and II, construction and operation. Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures. (CEQA has been clarified to indicate that impacts of the environment on the project are not considered impacts under CEQA as long as the project does not exacerbate the condition.)</i>

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Loss of topsoil, soil erosion.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Construction could result in loss of topsoil and erosion. Regulatory requirements and mitigation would address.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. The same mitigation would address impacts.</i>
Unstable soils, subsidence, liquefaction; expansive soils.	<i>Less than significant impact with mitigation Tiers I and II construction and operation. Potential for encountering resources during deeper excavations. Regulations and mitigation would address.</i>	<i>Less than significant impact with mitigation Tiers I and II construction and operation. The same mitigation would address impacts.</i>
Paleontological Resources	<i>Less than significant impact with mitigation Tiers I and II construction; no impact Tiers I and II operation. Mitigation would address potential impacts.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; no impact Tiers I and II operation. The same mitigation would address impacts.</i>
Greenhouse Gas Emissions		
Generate GHG emissions that could impact the environment.	<i>Significant and unavoidable impact Tiers I and II, construction and operation. Estimated net increase in emissions for Tier I of 16,300 MT; Tier II not quantified. Analysis could not determine if sector specific targets would be met. Mitigation measures would reduce emissions but not below a level of significance.</i>	<i>Significant and unavoidable impact Tiers I and II, construction and operation. Emissions from 2025 Master Plan Revisions would incrementally increase Tier I emissions and would continue to contribute to total emissions that would exceed the SCAQMD threshold.</i>
Consistency with applicable plans related to GHG emissions.	<i>Less than significant impact Tiers I and II, construction and operation. The Master Plan would be consistent with relevant polices and plans.</i>	<i>Less than significant impact Tiers I and II, construction and operation. The Master Plan would continue to be consistent with relevant polices and plans.</i>
Hazards and Hazardous Materials		
Routine transport.	<i>No or less than significant impact with Tiers I and II construction; less than significant impact Tiers I and II operation. Construction and operation involve transport of hazardous materials. Regulatory requirements address potential hazards.</i>	<i>No or less than significant impact Tiers I and II construction; less than significant impact Tiers I and II operation. Compliance with existing regulations would result in similar impacts to those identified in the Final EIR.</i>
Upset conditions.	<i>Less than significant impact with mitigation Tiers I and II construction and less than significant impact Tiers I and II operation. Potential transport and use of hazardous materials during construction is addressed by regulations and mitigation.</i>	<i>Less than significant impact with mitigation Tiers I and II construction and operation. Compliance with existing regulations and mitigation would result in similar impacts to those identified in the Final EIR.</i>
Hazardous Materials within ¼ mile of a school	<i>Less than significant impact Tiers I and II, construction and operation. The closest school is 0.6 miles from the Campus.</i>	<i>Less than significant impact Tiers I and II, construction and operation. The closest school is 0.6 miles from the Campus.</i>
Contaminated site.	<i>Less than significant impact with mitigation Tiers I and II construction and less than significant impact Tiers I and II operation. Fire Station 04 within the site and is identified as containing hazardous materials. Regulations and mitigation would address any hazards.</i>	<i>Less than significant impact with mitigation Tiers I and II construction and less than significant impact Tiers I and II operation. Same potential impacts as addressed in the Final EIR.</i>
Interfere with emergency response.	<i>Less than significant impact Tiers I and II, construction and operation. Regulatory requirements would ensure no interference.</i>	<i>Less than significant impact Tiers I and II, construction and operation. Regulatory requirements would ensure no interference.</i>

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Hydrology and Water Quality		
Violate water quality standards, substantially degrade surface or groundwater.	<i>Less than significant impact Tiers I and II, construction and operation.</i> Stormwater runoff could impact water quality, regulatory requirements would ensure adequate drainage and BMPs to address	<i>Less than significant impact Tiers I and II, construction and operation.</i> Stormwater runoff could impact water quality, regulatory requirements would ensure adequate drainage and BMPs to address.
Decrease groundwater	<i>Less than significant impact with mitigation Tiers I and II construction and operation.</i> Potential shallow groundwater not expected to be impacted. Increased water demand. Despite less than significant impact mitigation identified to ensure.	<i>Less than significant impact with mitigation Tiers I and II construction and operation.</i> No change in impacts from Final EIR.
Impacted by flood hazard, seiche, tsunami; risk of pollutant release from inundation	<i>Less than significant impact Tiers I and II, construction and operation.</i> There are no bodies of water nearby that could impact the site. Regulatory requirements would address containment of pollutants.	<i>Less than significant impact Tiers I and II, construction and operation.</i> There are no bodies of water nearby that could impact the site. Regulatory requirements address potential pollutants.
Conflict or obstruct water quality control plan or groundwater management plan.	<i>Less than significant impact Tiers I and II, construction and operation.</i> Stormwater management system and regulatory requirements would improve water quality.	<i>Less than significant impact Tiers I and II, construction and operation.</i> No change in impacts form Final EIR.
Land Use and Planning		
Potential to divide a community.	<i>No impact Tiers I and II, construction and operation.</i> Development of the Campus would be continuation of an existing use. This issue was dismissed in the Initial Study.	<i>No impact Tiers I and II, construction and operation.</i> Development of the Campus would be continuation of an existing use.
Consistency with applicable plans.	<i>Less than significant impact Tiers I and II construction and operation.</i> The Project would be substantially consistent with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect.	<i>Less than significant impact Tiers I and II construction and operation.</i> The Project would be substantially consistent with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect.
Mineral Resources		
Loss of mineral resources or access to mineral resources.	<i>No impact.</i> Since there are no mineral resources known to exist on the Campus. This issue was dismissed in the Final EIR Initial Study.	<i>No impact.</i> No mineral resources are known to exist in the vicinity of the Campus.
Noise		
Generate substantial temporary or permanent noise levels in excess of standards.	<i>Potentially significant and unavoidable impact Tiers I and II construction; less than significant impact with mitigation Tiers I and II operation.</i> Based on anticipated construction equipment and distance to sensitive receptors on-site construction noise impacts would be significant. Mitigation would reduce but not eliminate the impacts for construction. Mitigation would reduce noise from mechanical equipment to a less-than-significant level during operation.	<i>Potentially significant and unavoidable impact Tiers I and II construction; less than significant impact with mitigation Tiers I and II operation.</i> Same impacts as in Final EIR; Continuum of Care site is more than 1,300 feet from sensitive receptors.
Generate excessive groundborne vibration	<i>Potentially significant and unavoidable impact Tiers I and II construction; no impact Tiers I and II operation.</i> Vibration from heavy equipment during construction addressed by mitigation but in some cases possibly not below significance.	<i>Potentially significant and unavoidable impact Tiers I and II construction; no impact Tiers I and II operation.</i> Vibration from heavy equipment during construction addressed by mitigation; Continuum of Care site is somewhat distant from sensitive receptors.

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Located near an airstrip or airport and expose people to excessive noise levels.	<i>No impact Tiers I and II construction and operation.. No airports or air strips within two miles. Operations associated with the on-site helipad same not expected to change as a result of the project.</i>	<i>No impact Tiers I and II construction and operation.. No airports or airstrips within two miles. The 2025 Master Plan revisions would not affect helipad operations.</i>
Population and Housing		
Induce substantial population growth.	<i>Less than significant impact Tiers I and II construction and operation. Construction jobs are anticipated to draw from the local labor pool and not have a notable impact on housing demand. Operational employment would be consistent with local and regional forecasts.</i>	<i>Less than significant impact Tiers I and II construction and operation. The 2025 Master Plan Revisions would incrementally increase on-site jobs. Impacts would continue to be similar to those described in the Final EIR.</i>
Displace housing or people.	<i>No impact Tiers I and II construction and operation. There are no housing units on Campus at present.</i>	<i>No impact Tiers I and II construction and operation. There are no housing units on Campus at present.</i>
Public Services		
Impact to emergency access, police services, library services and parks such that new facilities need be constructed.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant Tiers I and II operation. Mitigation required to address impacts to emergency access during construction. Other impacts would be less than significant with no mitigation required.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant Tiers I and II operation. Impacts would be similar to those analyzed in the Final EIR.</i>
Recreation		
Impact to existing recreational facilities.	<i>Less than significant impact Tiers I and II construction and operation. Project construction and operation would not create substantially increased use of existing parks and recreational facilities.</i>	<i>Less than significant impact Tiers I and II construction and operation. Project construction and operation would not create substantially increased use of existing parks and recreational facilities.</i>
Require construction of new recreational facilities that would impact the environment.	<i>Less than significant impact Tiers I and II construction and operation. Minor construction of landscaped areas for passive recreation.</i>	<i>Less than significant impact Tiers I and II construction and operation. Minor construction of landscaped areas for passive recreation.</i>
Transportation and Traffic		
Conflict with plan addressing circulation, including transit, bicycle and pedestrian facilities.	<i>Less than significant impact with mitigation Tier I construction; less than significant impact Tier I operation; potentially significant impact Tier II construction and operation. Intermittent disruption during construction. Mitigation included for Tier I (and II) to address and ensure less than significant impact. Tier II not sufficiently known to evaluate.</i>	<i>Less than significant impact with mitigation Tier I construction; less than significant impact Tier I operation; potentially significant impact Tier II construction and operation. No change in impacts compared to those described in Final EIR.</i>
Potential to impact traffic including VMT	<i>Less than significant impact with mitigation Tier I construction; less than significant impact Tier I operation; potentially significant impact Tier II construction and operation. Project construction impacts addressed with construction management plan; Tier I operation found not to result in significant impacts. Tier II not sufficiently known to evaluate.</i>	<i>Less than significant impact with mitigation Tier I construction; less than significant impact Tier I operation; potentially significant impact Tier II construction and operation. Under the 2025 Master Plan Revisions, vehicle trips and associated miles travelled could increase incrementally; Tier I operation impacts would increase incrementally but still less than significant. Tier II not sufficiently known to evaluate.</i>

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Increase hazards due to geometric design.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tier I operation; potentially significant impact Tier II operation. Intermittent potential hazards during construction. Mitigation included for Tier I and II to address and ensure less than significant impact. Tier II not sufficiently known to evaluate</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tier I operation; potentially significant impact Tier II operation. Intermittent potential hazards during construction. Mitigation included for Tier I and II to address and ensure less than significant impact. Tier II not sufficiently known to evaluate</i>
Result in inadequate emergency access.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Mitigation would address emergency access during construction. Operations would not substantially affect emergency access.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Mitigation would address emergency access during construction. Operations would not substantially affect emergency access.</i>
Tribal Cultural Resources		
Result in a substantial adverse impact to a tribal cultural resource	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Moderate potential to encounter resources during construction addressed by mitigation.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Moderate potential to encounter resources during construction addressed by mitigation.</i>
Utilities and Service Systems		
Impacts to wastewater treatment, storm water, electricity, solid waste and natural gas.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tier I operation and potentially significant Tier II operation. Construction of new infrastructure is anticipated. Impacts would be addressed through mitigation as for other construction impacts. Tier II not sufficiently known to evaluate.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tier I operation and potentially significant Tier II operation. Construction of new infrastructure is anticipated. Impacts would be addressed through mitigation as for other construction impacts. Tier II not sufficiently known to evaluate.</i>
Have sufficient water supplies available. (The Final EIR also addressed limited supplies of natural gas.)	<i>Less than significant impact Tiers I and II construction and Tier I operation; potentially significant impact Tier II operation. Prior to 2040 UWMP provides for project uses. Mitigation requires further study of major post-2040 projects.</i>	<i>Less than significant impact Tiers I and II construction and Tier I operation; potentially significant impact Tier II operation. Prior to 2040 UWMP provides for project uses. Mitigation requires further study of major post-2040 projects.</i>
Impacts with respect to wastewater capacity	<i>Less than significant impact Tiers I and II construction and Tier I operation; less than significant impact with mitigation Tier II operation. Sewer capacity has preliminarily been determined to be available. Tier II will require further study.</i>	<i>Less than significant impact Tiers I and II construction and Tier I operation; less than significant impact with mitigation Tier II operation. 2025 Master Plan Revisions would not change conclusions..</i>
Solid waste impacts	<i>Less than significant impact Tiers I and II construction and operation. Campus would comply with requirements for recycling.</i>	<i>Less than significant impact Tiers I and II construction and operation. Campus would comply with requirements for recycling.</i>
Wildfire		
Impair emergency response.	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Emergency access to the Camps could be affected during construction. Mitigation would address.</i>	<i>Less than significant impact with mitigation Tiers I and II construction; less than significant impact Tiers I and II operation. Emergency access to the Camps could be affected during construction. Mitigation would address.</i>

3. Environmental Setting and Impact Analysis

Impact	Level of Significance Final EIR	Level of Significance 2025 Master Plan Revisions
Exacerbate risks, require installation of infrastructure, expose people or structures to risks including downslope flooding or landslides as a result of post-wildfire conditions	<i>Less than significant impact Tiers I and II construction and operation.</i> Construction involves flammable solvents addressed by regulations. Master Plan would address existing fire hazards.	<i>Less than significant impact Tiers I and II construction and operation.</i> Construction involves flammable solvents addressed by regulations. Master Plan would address existing fire hazards.

A. AESTHETICS

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to the Final EIR analysis.

(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse effects on a scenic vista?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

The Final EIR indicates that during construction of Master Plan projects, materials and activities may be visible from trails within the San Gabriel Mountains and Angeles National Forest that offer sweeping views of greater Los Angeles. New Master Plan buildings would also be visible from these trails and would introduce visual changes to existing viewsheds and scenic vistas. I-210, which is located approximately 300 feet south of the existing campus, is listed as a Designated Scenic Highway in the City’s General Plan and is an eligible State Scenic Highway. Despite the proximity of the highway, views of the campus and future construction activities and new buildings under Tiers I and II of the Master Plan would be limited, and, where available, fleeting due to the I-210’s below-grade configuration and intervening landforms and development.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The three-story Continuum of Care building would be partially built within the existing hillside. While the building would be three stories as compared to single storied buildings in the general vicinity, this difference in height would not result in a substantial change in views due to the hillside and project design. Therefore the Continuum of Care building would not result in substantial changes to the Campus as compared to what was evaluated in the Final EIR.

Conclusion

There would be no new or substantially greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

(b) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

The I-210 near the Campus is an eligible State Scenic Highway. No off-campus improvements are proposed that could affect scenic resources within the I-210 freeway.

The Final EIR indicates that most mature trees on the Campus would remain; however, some trees may have to be removed to accommodate Master Plan improvements and buildings. New landscaping, including trees and other vegetation, would be provided in accordance with Master Plan landscaping guidelines to improve the appearance of the campus.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

While the Continuum of Care facility and associated parking would result in the removal of some mature trees, the overall analysis of the Campus as a whole remains the same as evaluated in the Final EIR.

Conclusion

There would be no new or greater impacts than those identified in the Final EIR and no changes to or additional mitigation is required.

(c) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to: In non-urbanized areas, substantially degrading the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). In an urbanized area, project conflict with applicable zoning and other regulations governing scenic quality?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

During construction, the temporary presence of construction-related vehicles, equipment, barricading and cranes, etc., and construction-related excavation and grading, would result in changes to the visual setting. New Master Plan buildings, landscaping, and infrastructure improvements would change the visual setting of the campus. New buildings and landscaping would comply with the Master Plan design and landscaping guidelines that would address visual quality and would ensure that visual quality would not be significantly impacted.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The new building would comply with Master Plan design and landscaping guidelines and as noted above, while the building would be three stories as compared to single storied buildings in the general vicinity, this difference in height would not result in a substantial change in visual character due to the hillside and project design.

Conclusion

The 2025 Master Plan Revisions would not substantially change the aesthetic character of the site as compared to what was evaluated in the Final EIR. Impacts with respect to visual character and quality would be less than significant and similar to those of the 2019 Master Plan and no changes to or additional mitigation is required.

(d) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

Construction activities, which would be temporary, are expected to occur during daytime, consistent with County and City regulations and, therefore, would not introduce substantial new sources of light or glare. New Master Plan buildings and development would introduce new sources of light in an area where there are numerous existing sources of light and glare. In addition, new development would comply with the Master Plan Lighting Design Guidelines.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

Project building and parking would have similar impacts to the development analyzed in the Final EIR and would similarly comply with Master Plan Lighting Design Guidelines.

Conclusion

Impacts of the 2025 Master Plan Revisions with respect to light and glare would be less than significant, the same as those of the 2019 Master Plan and no changes to or additional mitigation is required.

B. AGRICULTURAL AND FORESTRY RESOURCES

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to agricultural and forestry resources compared to the Final EIR was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to any of the following:		
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (d) Result in the loss of forest land or conversion of forest land to non-forest use? (e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Campus is largely developed with existing medical center facilities and is located in a developed portion of the Sylmar community in the City of Los Angeles. The Campus is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the 2019 Master Plan would not convert such farmland to nonagricultural use. No further analysis beyond the Initial Study was warranted.

The Campus is not under Williamson Act contract (California Department of Conservation, 2008), nor is it zoned or designated for agricultural use. The project site is an existing medical center that includes an existing hospital, medial buildings surface parking and open space areas. There is no nearby agricultural land. The 2019 Master Plan had no potential to convert farmland, conflict with agricultural zoning, or lead to other changes in the existing environment that could lead to farmland conversion. Since the 2019 Master Plan had no impact with regard to conflicts with existing land zoned for agricultural use, there was no potential to contribute to a cumulative impact on agriculturally zoned land. No further analysis beyond the initial Study warranted in the Final EIR.

The Campus is not zoned as forestland, timberland, or timberland zoned Timberland Production. The Campus does not contain forestland or timberland. Therefore, the 2019 Master Plan had no potential to conflict with existing zoning or cause rezoning of forest or timberland, no potential to affect forestland or timberland, and no potential for a contribution to a cumulative impact with regard to conversion of forestland or timberland. No further analysis beyond the Initial Study was warranted in the Final EIR.

The Campus is not located on or near forestland. Therefore, the 2019 Master Plan had no potential to result in the loss or conversion of forestland and would also not contribute to a cumulative impact with regard to forestland conversion. No further analysis was warranted in the Final EIR.

The 2019 Master Plan had no potential to convert farmland or forestland and no potential to result in a secondary impact with regard to farmland or forestland conversion, and therefore no potential to contribute to a cumulative farmland or forestland conversion impact. No further analysis beyond the initial Study was warranted in the Final EIR.

2025 Master Plan Revisions

Construction and Operation: No Impact, Tiers I and II

The land uses on the Campus and surrounding area have not changed since the Final EIR. The Campus is not located on designated farmland or forest land. The 2025 Master Plan Revisions would not convert farmland or forest land, nor would it conflict with existing zoning for agricultural or forestry uses or a Williamson Contract.

Conclusion

As under the 2019 Master Plan, the 2025 Master Plan Revisions would have no impacts with respect to agricultural and forest resources and no mitigation would be required.

C. AIR QUALITY

Air quality impacts of the 2025 Master Plan Revisions were evaluated with regard to the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to air quality was evaluated in relation to four questions recommended for consideration by the *State CEQA Guidelines*.

(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

The 2019 Master Plan was determined to be consistent with the City’s General Plan and the goals of SCAG’s RTP/SCS (see Section 3.9, Land Use/ Planning of the Final EIR for more discussion). The 2019 Master Plan was considered consistent with the governing land use document, which is the City of Los Angeles General Plan. Pursuant to SCAQMD guidelines, the 2019 Master Plan was therefore determined to be consistent with the region’s AQMP. As such, project-related emissions were accounted for in the AQMP, which was crafted to bring the Basin into attainment status for all nonattainment pollutants and precursors thereof. Accordingly, the 2019 Master Plan was determined to not conflict with or obstruct implementation of the applicable air quality plan. This impact was considered less than significant.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2019 Master Plan. With the 2025 Master Plan Revisions, the Campus would continue to be consistent with the growth projections in the City’s General Plan and the most recent (2024) RTP/SCS and thus consistent with the growth projections in the most recent AQMP (2022). The 2025 Master Plan Revisions would continue to be supportive of RTP/SCS policies and sustainability practices (including designing to LEED Gold standards). Because the 2025 Master Plan

Revisions would be consistent with the growth projections in the AQMP and would be supportive of relevant policies, the 2025 Master Plan Revisions would have similar impacts related to consistency with the AQMP as the 2019 Master Plan, which would be less than significant.

Conclusion

Impacts of the 2025 Master Plan Revisions related to consistency with the AQMP would be similar to those of the 2019 Master Plan as described in the Final EIR; no changes to or additional mitigation is required.

(b) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region air basin is non-attainment under an applicable federal or state ambient air quality standard?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Los Angeles County portion of the South Coast Air Basin is designated nonattainment for the National Ambient Air Quality Standards for ozone and particulate matter less than 2.5 micrometers (PM2.5) and designated nonattainment for the California Ambient Air Quality Standards for ozone, nitrogen dioxide, particulate matter less than 10 micrometers (PM10), and PM2.5.

2019 Master Plan

Construction: *Less than Significant Impact with Mitigation, Tier I
Significant and Unavoidable Impact, Tier II*

During construction, using conservative assumptions, maximum daily project-related criteria pollutant emissions were identified to exceed SCAQMD regional construction-period thresholds for volatile organic compounds (VOC) during the architectural coatings phase of the Ambulatory Care Center and other buildings and oxides of nitrogen (NOx) during construction of the Ambulatory Care Center and other Tier I buildings (operation of the Recuperative Care Village would overlap with this construction and would add minorly to emissions). Mitigation measure MM-AQ-1, which would require low-VOC coatings beyond SCAQMD requirements for non-residential uses, would reduce VOC emissions. Mitigation measure MM-AQ-2, which would require a cleaner construction equipment fleet (EPA Tier 4 engines for equipment rated 50 hp or greater), would reduce NOx and VOC emissions. Implementation of Mitigation Measures AQ-1

and AQ-2 would reduce emissions during project construction to below SCAQMD thresholds for Tier I. Impacts were considered less than significant with mitigation incorporated for Tier I construction.

Because details of construction of Tier II buildings were not known, construction emissions for Tier II were not quantified. The Final EIR indicated that emissions could exceed SCAQMD standards for regional and localized pollutants. The Final EIR indicated that in the event that Tier II construction activities result in emissions that exceed regional or localized standards at the time plans for Tier II are developed, MM-AQ-3 and MM-AQ-4 will be implemented to ensure that impacts are minimized to the extent feasible. Additionally, implementation of MM-GHG-C1 (Section 3.7, Greenhouse Gas Emissions, of the Final EIR), which would implement idling time restrictions, compliance with manufacturer's equipment specifications, potential use of alternative fuels, and use of local and recycled materials, would further reduce air pollutant emissions during construction. Although MM-AQ-3 and MM-AQ-4, along with MM-GHG-C1, would control construction-period emissions under Tier II, the Final EIR could not state with certainty that emissions would be below applicable regional or localized emissions thresholds. Thus, construction impacts for Tier II were identified as significant and unavoidable.

***Operation: Less than Significant Impact, Tier I
Significant and Unavoidable Impact, Tier II***

During operation, maximum daily project-related criteria pollutant emissions were not expected to exceed SCAQMD operations-period thresholds for any pollutant for Tier I. Consequently, the impact of operations-related emissions from the 2019 Master Plan Tier I was considered less than significant. Operational emissions for Tier II were not quantified. The Final EIR indicated that emissions under Tier II could exceed operational thresholds for regional and localized pollutant emissions depending on project details. In the event that Tier II operational activities result in emissions that exceed regional or localized standards at the time plans for Tier II are developed further, MM-AQ-5 will be implemented to ensure that impacts are minimized to the extent feasible. Additionally, implementation of MM-GHG-O1 (Section 3.7, Greenhouse Gas Emissions, of the Final EIR), which would implement sustainability measures related to water and energy conservation and solid waste and vehicle-trip reductions, would reduce the project's operational emissions. Although MM-AQ-5 and MM-GHG-O1 would control operational emissions under Tier II, the Final EIR could not state with certainty that emissions would be below applicable regional or localized emissions thresholds. Thus, impacts for Tier II were identified as significant and unavoidable.

2025 Master Plan Revisions

***Construction: Less than Significant Impact with Mitigation, Tier I
Significant and Unavoidable Impact, Tier II***

The 2025 Master Plan Revisions would result in fewer construction emissions as compared to the recently completed Restorative Care Village. Therefore, maximum daily Tier I construction associated with the proposed 2025 Master Plan revisions (Continuum of Care facility combined with remaining Tier I construction) would be similar to or less than identified in the Final EIR. The 2025 Master Plan Revisions would comply with required mitigation measures MM-AQ-1 and MM-AQ-2, which as determined in the Final EIR, would ensure Tier I construction emissions would not exceed applicable thresholds of significance. Therefore, the 2025 Master Plan Revisions would not result in a cumulatively considerable net increase of a criteria pollutant. Consequently, construction impacts would be less than significant with mitigation, the same as under the 2019 Master Plan. No changes are proposed to Tier II; impacts of Tier II would continue to be considered significant.

***Operation: Less than Significant Impact, Tier I
Significant and Unavoidable Impact, Tier II***

The incremental increase in building areas attributable to 2025 Master Plan Revisions would not result in a substantial increase in Tier I operational emissions as compared to that analyzed in the Final EIR. Therefore, emissions from Tier I operation of the 2025 Master Plan Revisions would be similar to those of the 2019 Master Plan and would not exceed the thresholds of significance for any criteria pollutant. Therefore, the 2025 Master Plan Revisions operational impacts regarding Tier I would be less than significant. No changes are proposed to Tier II; impacts of Tier II would continue to be considered significant.

Conclusion

Criteria pollutant emissions associated with the 2025 Master Plan Revisions would be similar to those evaluated for the 2019 Master Plan and would be less than significant and no changes to or additional mitigation is required.

(c) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

***Construction: Less than Significant Impact with Mitigation, Tier I
Significant and Unavoidable Impact, Tier II***

Construction of 2019 Master Plan Tier I facilities and improvements was not anticipated to exceed localized significance thresholds (LSTs) even without mitigation and was not expected to exceed the SCAQMD maximum incremental cancer risk threshold for Toxic Air Contaminants (TACs) of 10 in 1 million. As such impacts of Tier I construction were found to be less than significant; the Final EIR identified the impact as less than significant with mitigation even though mitigation was not technically required.

As noted above, construction emissions for Tier II were not quantified. Although MM-AQ-3, MM-AQ-4, along with MM-GHG-C1, would control construction-period emissions under Tier II, the Final EIR could not state with certainty that emissions would be below applicable regional or localized emissions thresholds. Thus, Tier II construction impacts were identified as significant and unavoidable.

***Operation: Less than Significant Impact, Tier I
Significant and Unavoidable Impact, Tier II***

Tier I operation would not result in localized emissions exceeding LSTs for the project area. Tier I operations impacts were found to be less than significant.

Although MM-AQ-5 and MM-GHG-O1 would control operational emissions under Tier II, the Final EIR could not state with certainty that emissions would be below applicable LSTs. Thus, impacts for Tier II were identified as significant and unavoidable.

2025 Master Plan Revisions

Construction: *Less than Significant Impact with Mitigation, Tier I
Significant and Unavoidable Impact, Tier II*

The construction activities for the 2025 Master Plan Revisions would be similar to those of the 2019 Master Plan. Maximum localized emission concentrations during construction activities would be similar to the 2019 Master Plan and therefore would be less than significant without mitigation. But, similar to the Final EIR, these impacts are considered less than significant with mitigation for purposes of this Addendum. No changes are proposed to Tier II; impacts of Tier II would continue to be considered significant.

Operation: *Less than Significant Impact, Tier I
Significant and Unavoidable Impact, Tier II*

The 2025 Master Plan Revisions would result in incremental increases in operational emissions that would not be expected to result in increases sufficient to come close to exceeding applicable LSTs. Therefore, with respect to localized operational emissions, impacts of the 2025 Master Plan Revisions would continue to be less than significant, the same as those of the 2019 Master Plan. No changes are proposed to Tier II; impacts of Tier II would continue to be considered significant.

Conclusion

Emissions associated with the 2025 Master Plan Revisions on the Campus as a whole would be similar to those evaluated for the 2019 Master Plan. Localized impacts and impacts on sensitive receptors would remain significant during construction; impacts would be less than significant for operation and no changes to, or additional mitigation is required.

(d) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to other emissions such as those leading to odors adversely affecting a substantial number of people?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment facilities, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. The 2019 Master Plan includes none of these land uses. During the construction period, some limited odors may result from asphalt paving activities, which may be detectable by people immediately adjacent to work sites. However, asphalt paving would occur for a limited time period at each excavation site (less than 1 week), and the locations of paving activities would be distributed over several excavation sites at any one time. Furthermore, SCAQMD Rule 402 prohibits the discharge of air contaminants that cause nuisance or annoyance including odors. The Final EIR determined odor impacts during construction and operation of Tier I and II were less than significant without mitigation.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would include similar construction activities as the 2019 Master Plan and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to construction odors (Tiers I and II) would be the same as those of the 2019 Master Plan; impacts would be less than significant.

The 2025 Master Plan Revisions would include generally the same operational uses as the 2019 Master Plan and would not create or introduce objectionable odors affecting a substantial number of people. Therefore, impacts related to operational odors (Tiers I and II) would be the same as those of the 2019 Master Plan; impacts would be less than significant.

Conclusion

The 2025 Master Plan Revisions would have similar emissions, including odor emissions, as compared to the 2019 Master Plan and impacts would continue to be less than significant and no changes to or additional mitigation is required.

D. BIOLOGICAL RESOURCES

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to biological resources than analyzed in the Final EIR was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?		
(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 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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

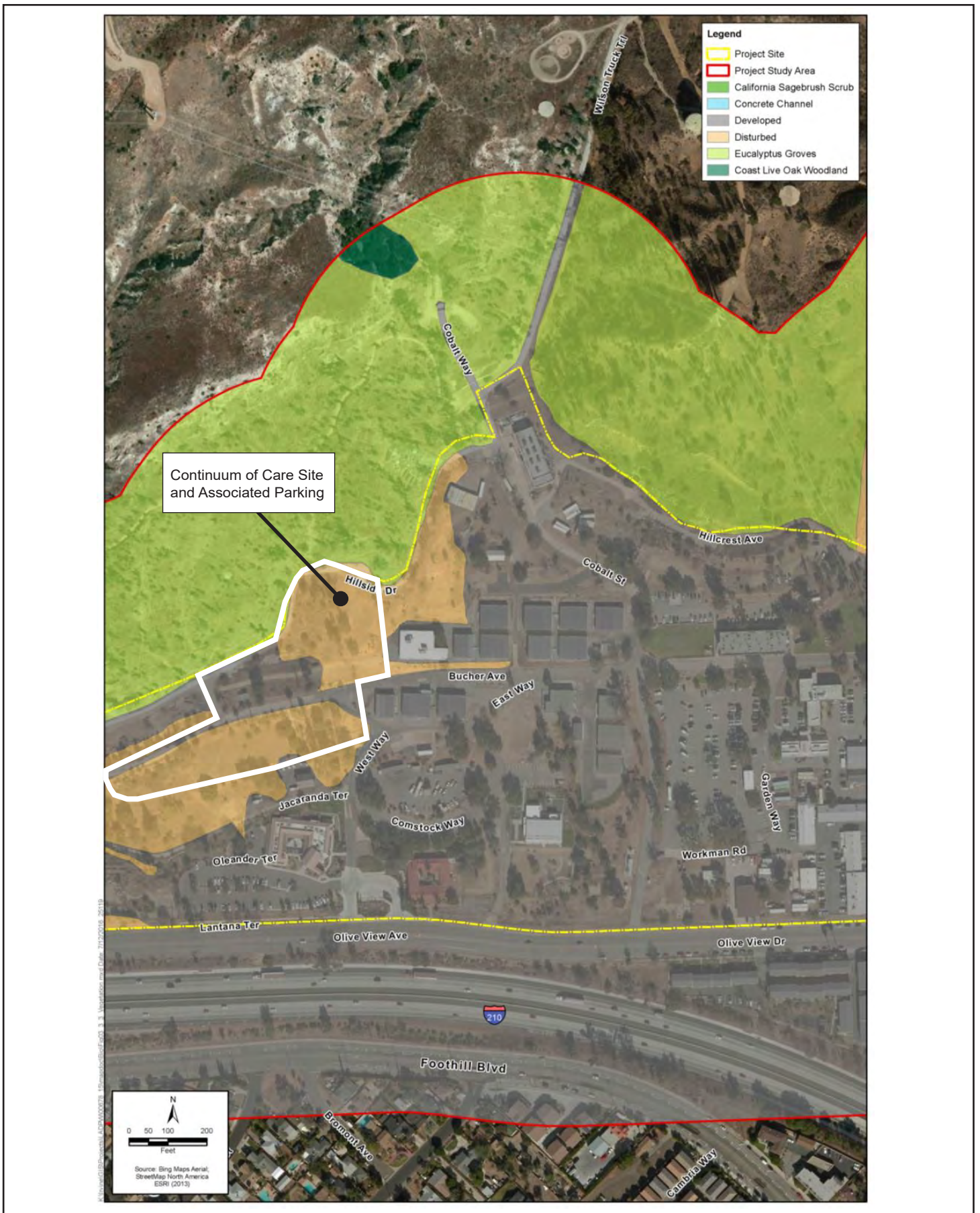
2019 Master Plan

Construction and Operation

Sensitive and Special Status Species: Less Than Significant Impact With Mitigation, Tiers I and II Construction; Less Than Significant Impact, Tiers I and II Operation

Figure 12 shows the Final EIR mapped vegetative communities in the vicinity of the Continuum of Care building site and associated parking. The Final EIR indicates the removal or modification of abandoned buildings that provide suitable roosting habitat within the project area may result in impacts on two bat species: pallid bat and Townsend’s big-eared bat.

Construction activities may also affect other special-status species, including coast horned lizard, silvery legless lizard, and San Diego woodrat; these species occur throughout Southern California. Implementation of MM-BIO-1 would reduce the potential impacts of construction activities on roosting bats to a less-than-significant level for both Tier I and Tier II.



SOURCE: ICF, 2016.

FIGURE 12

The Final EIR identified the eastern portion of the Campus as having suitable habitat for California gnatcatcher; the Continuum of Care site is located in the western portion of the site and would not be expected to substantially impact coastal California gnatcatcher.

Operational activities on the Campus, which would expand the footprint of existing activities, were not expected to result in significant impacts on bat species that may roost on the project site. While the Final EIR noted habitat for coastal California gnatcatcher on the eastern portion of the site impacts were identified to be less than significant.

Therefore, construction and operation of the facilities and buildings proposed under the 2019 Master Plan were not identified as having an adverse impact on any candidate, sensitive, or special-status animal or plant species. Impacts associated with buildout of the 2019 Master Plan were considered less than significant with mitigation.

Riparian and other Sensitive Areas and Wetlands: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact with Mitigation, Tiers I and II Operation (with respect to the eastern Campus and maintaining California sagebrush habitat)

The Final EIR indicated that construction activities could affect a small amount of potential jurisdictional waters on the campus, including two blue line concrete box culverts and nine blue line and non-blue line features. These features have limited functions and values and are ephemeral in nature. Reflecting regulatory requirements, MM-BIO-3 requires that a jurisdictional delineation be conducted within the project site and that if jurisdictional features are identified they will be avoided or if avoidance is not feasible appropriate permits will be obtained from the U.S. Army Corps of Engineers (USACOE), Regional Water Quality Control Board (RWQCB) and California Département of Fish and Wildlife (CDFW). Thus, the Final EIR identifies impacts to wetlands and riparian areas to be less than significant with mitigation.

The Final EIR indicates that California sagebrush is present in the eastern portion of the Campus and identifies mitigation measure MM-BIO-6 to address impacts (preparation and long-term implementation of a Habitat Mitigation Monitoring Plan). The Final EIR indicates construction may require removal of coast live oak trees. Reflecting regulatory requirements, MM-BIO-5 requires that a qualified arborist prepare a report addressing preservation and required replacement in order to obtain an oak tree permit. The Los Angeles County Protected Tree ordinance (updated in February 2021) protects more than just oak trees (also Southern California Black Walnut, Western Sycamore, California Bay as well as Mexican Elderberry and Toyon) and implementation of the 2019 Master Plan is required to comply with that ordinance.

Individual construction projects are required to obtain and comply with a General Construction Permit through the State Water Resources Control Board. This permit and associated NPDES requirements include

development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), with associated monitoring and reporting. Stormwater best management practices (BMPs) would be required to control erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. Additional source-control BMPs are also required to prevent runoff contamination by potentially hazardous materials and eliminate non-stormwater discharges.

Wildlife Movement: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact, Tiers I and II Operation

As noted above, the Final EIR indicates that removal or modification of the buildings that provide suitable roosting habitat within the project site (Tiers I and II) may result in impacts to maternity bat roosts. Mitigation measures MM-BIO-1 and MM-BIO-2 would address this impact and reduce it to a less-than-significant level. The Final EIR indicates that construction activities (Tiers I and II) may also result in direct and indirect impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) and temporarily cause portions of the site to be inaccessible to bird species in the area. Removal of vegetation and the demolition of structures during construction could result in direct impacts on nests that are protected under the MBTA. Also, high noise levels and dust from construction activity could cause indirect impacts on nests and cause failure. Reflecting regulatory requirements, MM-BIO-4 was identified to ensure that the potential impacts of construction activities on nesting birds that are protected under the MBTA and California Fish and Game Codes would be reduced to a less-than-significant level. Impacts during operation were identified as less than significant for Tiers I and II.

2025 Master Plan Revisions

Construction and Operation

Sensitive and Special Status Species: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact, Tiers I and II Operation

The 2025 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR but in an area that was not previously identified for development; the remainder of the Campus would continue to be generally developed under the 2019 Master Plan. A biologist undertook a site reconnaissance of the Continuum of Care site December 5, 2024 (see **Attachment A1, Biological Evaluation**). The site contains native vegetation similar to other areas of the Campus identified for development. An abandoned chiller structure on the Continuum of Care building site has the potential to contain roosting bats. The site contains a short (approximately 50 feet) surface drainage—extending from under Hillside Drive above ground to an underground pipe in the northern portion of the center of the site (see **Figures 13 and 14**). The County’s

Protected Tree Ordinance (updated in 2021 to include additional species) would apply to removal of protected trees and shrubs.

Riparian and Other Sensitive Areas and Wetlands: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact with Mitigation, Tiers I and II Operation (with respect to the eastern Campus and maintaining California sagebrush habitat)

The County intends to avoid impacts to the above-ground drainage and therefore jurisdictional permits are not anticipated to be needed. Impacts of the 2025 Master Plan Revisions on candidate, sensitive, or special-status species would be similar to those identified for the 2019 Master Plan and less than significant with mitigation for Tier I and II construction, and less than significant for operation. Impacts with respect to riparian and other sensitive areas and wetlands would also continue to be less than significant with mitigation for Tier I and II construction and less than significant for operation. The 2025 Master Plan Revisions would not affect the eastern portion of the Campus and the associated sagebrush habitat.

Wildlife Movement: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact, Tiers I and II Operation

The 2025 Master Plan Revisions would have similar impacts on wildlife (including bats) and migratory birds due to the removal of the on-site structure and on-site trees. Impacts would continue to be less than significant with implementation of mitigation for Tiers I and II construction and less than significant for operation.

Conclusion

Impacts to biological resources would be similar for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the Final EIR and no changes to or additional mitigation are required.

(e) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>



SOURCE: Impact Sciences, 2024.

FIGURE 13

View of Drainage Emerging from Under Hillside Drive Continuum of Care Building Site



SOURCE: Impact Sciences, 2024.

FIGURE 14

View of Drainage Northern Portion of Continuum of Care Site where it Enters Pipe

2019 Master Plan

Construction: *Less than Significant Impact with Mitigation, Tiers I And II*

Operation: *Less than Significant Impact, Tiers I and II*

The Final EIR indicates that construction of proposed Master Plan facilities and structures could result in damage to, or removal of, vegetation on the project site, including native oak trees that have been planted in ornamental areas or that occur naturally. The Final EIR indicates a mitigation measure (MM-BIO-5) for an arborist to prepare a report to address oak tree removal. Regulations have changed since the certification of the Final EIR and the County's Tree protection Ordinance now requires that more than just oak trees be addressed by the arborists report (also Southern California Black Walnut, Western Sycamore, California Bay as well as Mexican Elderberry and Toyon).

2025 Master Plan Revisions

Construction: *Less than Significant Impact with Mitigation, Tiers I and II*

Operation: *Less than Significant Impact, Tiers I and II*

The 2025 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; the remainder of the Campus would continue to be developed under the 2019 Master Plan. The Continuum of Care site contains a number of native plants and shrubs that will be subject to the County's Protected Tree ordinance as amended. A Protected Tree Report was prepared for the Continuum of Care facility (see **Attachment A2**). The Protected Tree Report includes a tree inventory (undertaken January 16, 2025 and January 17, 2025) of 75 trees and shrubs, including 42 Protected Tree and Shrubs listed in the City of Los Angeles Preservation of Protected Trees Ordinance 186,873. County protected tree regulations only address oak trees. The Protected Tree Report indicates that there are no woodlands on the site (woodlands are defined as being comprised of two or more trees of the same species with a trunk diameter greater than 54 inches, whose sphere of influence overlaps). The Protected Tree Report indicates that a total of 19 trees and shrubs: 11 coast live oaks (*Quercus agrifolia*), six toyons (*Heteromeles arbutifolia*), and two elderberries (*Sambucus mexicana*) are proposed to be removed for the construction of the Continuum of Care facility. The County is only required to comply with County regulations which require that oaks be replaced at a ratio of 2 to 1 (minimum 15 gallon size), as compared to the City's ordinance which requires replacement at a ratio of 4 to 1 for all protected trees and shrubs. The remaining 23 Protected Trees and Shrubs will be protected during construction in accordance with applicable regulations. The County is currently evaluating planting options based on both the City and County regulations. If the County follows the County regulations then replacement of Toyon and elderberries, while not required, are proposed using the same replacement ratio as required for oak trees.

The landscape plan incorporated into the 2025 Master Plan Revisions will address the replacement of trees and shrubs in accordance with applicable regulations. MM-BIO-5 would continue to apply and would be enhanced by proposed replacement of Toyon and elderberries.

Conclusion

Impacts related to local policies or ordinances protecting biological resources would be the same for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the Final EIR and no changes to or additional mitigation is required.

(f) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Campus and its surroundings are not in or near an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Final EIR determined that implementation of the 2019 Master Plan would not conflict with any such plans and no impacts would occur during construction or operation.

2025 Master Plan Revisions

Construction and Operation

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans have been adopted covering the Campus or adjacent areas. Therefore, the 2025 Master Plan Revisions would not conflict with any such plans and no impacts would occur during construction or operation, the same as for the 2019 Master Plan.

Conclusion

Impacts related to adopted habitat plans and natural community conservation plans would be the same for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the Final EIR and no changes to or additional mitigation is required.

E. CULTURAL RESOURCES

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the Final EIR, required mitigation measures and three questions recommended for consideration by the *State CEQA Guidelines*.

(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Olive View–UCLA Medical Center Campus has been surveyed for historical resources several times, by both local and federal agencies, beginning in 1994. No historical resources were identified on the Campus and no impact would occur.

2025 Master Plan Revisions

Construction and Operation: No Impact, Tiers I and II

The 2025 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR; no historical resources have been identified on the Campus. Therefore, similar to the Final EIR, no impact would occur.

Conclusion

Impacts to historical resources would be the same for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the 2014 FEIR and no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		
(c) Disturb any human remains, including those interred outside of formal cemeteries?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

The Final EIR describes the Campus as having been subject to surface disturbance over the past 130 years since it was first developed. For this reason, it is likely that any resources that may have been present on the property have been disturbed or removed. Nonetheless, previously undiscovered buried archaeological resources could still exist on the property. No known burial sites or cemeteries have been identified on the property.

Construction: Less than Significant Impact with Mitigation, Tiers I and II

Surface disturbances over the past 130 years have probably destroyed intact archaeological resources. Therefore, there is a low likelihood of encountering prehistoric and historical archaeological resources. Nonetheless, the possibility remains that structural demolition and grading and excavation for new foundations and access routes could affect unknown buried archaeological resources. Construction impacts on archaeological resources, if any were to be found, were expected to be reduced to a less-than-significant level with implementation of mitigation measures MM-CR-1 through MM-CR-6.

The Campus is not located in an area that contains formal or known informal cemeteries. Should human remains be uncovered during construction, mitigation plans would require construction to halt in the area of discovery, the area to be protected, and no further disturbance to occur, as specified by State Health and Safety Code Section 7050.5. Impacts on human remains, if any, are expected to be reduced to a level of less than significant with implementation of mitigation measure MM-CR-6.

Operation: No Impact, Tiers I and II

Operation of the Master Plan would not affect archaeological resources or human remains.

2025 Master Plan Revisions

Construction: Less than Significant Impact with Mitigation, Tiers I and II

The 2025 Master Plan Revisions are on a portion of the Campus evaluated in the Final EIR. The 2025 Master Plan Revisions would include the same type of ground-disturbing activities as the 2019 Master Plan. As for the 2025 Master Plan Revisions, the possible presence of unknown archaeological resources would result in the same potential for significant impacts to archaeological resources and human remains. The 2025 Master Plan Revisions would be subject to the same regulations and mitigation measures, MM-CR-1 through MM-CR-16, which would continue to reduce these impacts to a less-than-significant level.

Operation: No Impact, Tiers I and II

Operation of the Master Plan would continue to have no impact on archaeological resources or human remains.

Conclusion

Impacts to archeological resources would be the same for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the Final EIR and no changes to or additional mitigation is required.

F. ENERGY

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to energy was evaluated in relation to the Final EIR, required mitigation measures and two questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact, Tiers I and II

Construction of the project would require the use of energy resources including natural gas, electricity, and transportation fuels. It is anticipated that construction contractors, to reduce costs, would implement energy conservation practices including using fuel efficient vehicles and equipment to the extent practicable and maintaining construction equipment in accordance with manufacturers’ specifications so equipment performance would not be compromised.

Operation: Less than Significant Impact, Tiers I and II

New and renovated buildings and facilities that may occur under the 2019 Master Plan could result in long-term increases in energy consumption. However, the 2019 Master Plan included energy efficient project elements such as solar electric power, solar thermal and hot water, as well as ground source heating energy for various facilities. In addition, the Campus would comply with Title 24’s energy conservation standards for new construction. As an essential use, hospital energy use would not be wasteful or inefficient.

2025 Master Plan Revisions

Construction: Less than Significant Impact, Tiers I and II

The California Green Building Standards Code (CALGreen Code) establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The 2025 Master Plan Revisions would comply with or exceed the applicable provisions of the Title 24 Building Standards Code and the California Green Building Standards in effect at the time of building permit issuance. The 2025 Master Plan Revisions would be designed to LEED Gold standards.

The 2025 Master Plan Revisions would also use construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Therefore, the 2025 Master Plan Revisions would also meet or exceed the required level of waste recycling and reuse rate for construction and demolition debris.

Therefore, as with the 2019 Master Plan, the 2025 Master Plan Revisions would not result in the wasteful, inefficient, or unnecessary consumption of energy and would not preempt future energy conservation. As a result, impacts related to construction energy use with the 2025 Master Plan Revisions would be the same or less than those of the 2019 Master Plan and would be less than significant.

Operation: Less than Significant Impact, Tiers I and II

Operation of the 2025 Master Plan Revisions would utilize energy in the same way as the 2019 Master Plan, for necessary on-site activities and off-site transportation associated with Campus employees, patients, and visitors traveling to and from the site. Similar to the 2019 Master Plan, the amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. The 2025 Master Plan Revisions would also meet or exceed energy standards by incorporating green building measures consistent with the County's Climate Action Plan (CAP); buildings would now be required to meet LEED Gold-level standards. Overall, the 2025 Master Plan Revisions would replace some of the same aging facilities and infrastructure with new ones providing considerably higher efficiency in terms of energy and water demands. The 2025 Master Plan Revisions would comply with the mandatory measures for new non-residential buildings. The 2025 Master Plan Revisions would also meet or exceed the applicable provisions of Title 24 and the California Green Building Standards in effect at the time of the building permit issuance.

The 2025 Master Plan Revisions would contribute to increasing the overall intensity of land uses on the Campus but would use less energy per square foot of development compared to existing conditions. As a result, impacts would be the same as those of the 2019 Master Plan, less than significant.

Conclusion

Impacts with respect to wasteful use of energy and consistency with applicable renewable energy and/or energy efficiency plans for the 2025 Master Plan Revisions would be similar to the 2019 Master Plan and would be less than significant and no changes to or additional mitigation is required.

G. GEOLOGY AND SOILS

Impacts with respect to geology and soils of the 2025 Master Plan Revisions were evaluated with regard to the Final EIR and required mitigation measures. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions takes in to account the decision from *CBIA v. BAAQMD*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(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) Being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed 2025 Master Plan Revisions, 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 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?		
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?		
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Seismic Hazards: Less than Significant Impact with Mitigation, Tiers I and II

The Campus is located within the vicinity of known active earthquake faults, including the Santa Susana Fault less than 0.1 mile from the site, the Northridge Blind Thrust 0.5 miles from the site, and the Sierra Madre (San Fernando) fault 1.7 miles from the site. Moreover, the project site was previously subjected to substantial surface rupture resulting from the 1971 Sylmar Earthquake. Therefore, there is a possibility for seismic surface rupture to occur at the site. Because active faults lay in the project vicinity, the project area could result in strong ground shaking which could affect the project site. The northeastern portion of the Campus near the mouth of Wilson Canyon is located within an area that is considered susceptible to liquefaction. Due to the presence of steep hillside areas and a previously mapped earthquake, which induced landslides in the northern portion of the project site, there is potential for landslides, mudflows, or seismic slope instability. Earthquake-induced landslides could also be caused by construction activities, such as grading that undercuts the toe of a slope or induces loading at the top of a slope.

Implementation of mitigation measure MM-GEO-C1 would reduce potential fault rupture hazards, as well as ground shaking and ground failure hazards to a less- than-significant level.

Soil Erosion: Less than Significant Impact with Mitigation, Tiers I and II

During the construction period, excavation, grading, and trenching would occur, creating the potential for erosion. Additionally, portions of the campus are currently undeveloped and subject to potential water and wild soil erosion. Implementation of a Stormwater Pollution Prevention Plan (SWPPP) identified in MM-GEO-C2, that incorporates best management practices (BMPs) in compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements would ensure that sediment would be confined to the construction area. During operation of proposed developments, improvements at the project site and incorporation of BMPs would ensure that onsite soil erosion would be minimized.

Soil Conditions: Less than Significant Impact with Mitigation, Tiers I and II

For both construction and operation, the potential for subsidence on the project site is relatively low. However, groundwater may be encountered during excavation activities, which could cause soil instability. In addition, compressible/collapsible soils at the site would result in differential settlement and may contribute to soil instability. According to the Preliminary Geotechnical Evaluation prepared for the proposed project, the near-surface soils at the project site are predominantly comprised of sandy, coarse-

grained materials. These soils typically have a low expansion potential. However, clayey soils may be present in areas of the project site. Implementation of mitigation measure MM-GEO-C1 would reduce potential impacts associated with site soils to a less-than-significant level.

Use of Septic Tanks: No Impact, Tiers I and II

The Campus is in an urbanized area with wastewater infrastructure already in place. The 2019 Master Plan facilities were anticipated to connect to existing off-site City of Los Angeles infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, the no impacts with respect to septic systems were identified.

Paleontological Resources: Less than Significant Impact with Mitigation Construction, No Impact Operation, Tiers I and II

Structural demolition and grading and excavation for new foundations and access routes, as well as excavation for parking structures, have the potential to affect paleontological resources. Surface grading or shallow excavations in the uppermost few feet of the younger Quaternary alluvium in the area are unlikely to uncover significant fossil vertebrate remains. However, deeper excavations in the area that extend down into older sedimentary deposits, as well as any excavations in the Pacoima Formation in the northern portion of the campus may well encounter and consequently, could damage or destroy significant vertebrate fossils. Implementation of mitigation measure MM-GEO-C3 would reduce potential impacts associated with paleontological resources to a less-than-significant level.

Operation of the Olive View-UCLA Medical Center Campus under the 2019 Master Plan would not affect paleontological resources, no impact would occur.

2025 Master Plan Revisions

Construction and Operation

Seismic Hazards: Less than Significant Impact with Mitigation, Tiers I and II

Potential impacts related to fault rupture, seismic shaking and ground failure are generally impacts of the environment on the project; the project would not exacerbate this impact. The Continuum of Care site includes some relatively steep slopes that could be subject to landsliding. Mitigation measure MM-GEO-C1 would continue to be implemented—it is generally required by existing regulations—and would continue to reduce potential impacts to a less-than-significant level.

Soil Conditions: Less than Significant Impact with Mitigation, Tiers I and II

The 2025 Master Plan Revisions would be required to comply with the County NPDES permit and implement the SWPPP (MM-GEO-C2) for erosion control. It would also implement BMPs to address water- and wind-related erosion. Therefore, like the 2019 Master Plan, potential soil erosion impacts during construction would be less than significant. BMPs related to ongoing drainage design and maintenance practices would also be included in the SWPPP and implemented to reduce soil erosion during operation of the 2025 Master Plan Revisions. The design of the 2025 Master Plan Revisions would also address soil erosion through design procedures such as appropriate surface drainage design of roadways and facilities to provide for positive surface runoff, the same as included in the 2019 Master Plan. It would also comply with the County's LID ordinance. Therefore, impacts would be the same as those of the 2019 Master Plan; impacts related to soil erosion and loss of soil would be less than significant.

Use of Septic Tanks: No Impact, Tiers I and II

As for the 2019 Master Plan, the 2025 Master Plan Revisions would connect to the existing sewer system and would have no impact related to septic tanks and alternative waste disposal systems.

Paleontological Resources: Less than Significant Impact with Mitigation Construction, No Impact Operation, Tiers I and II

Construction of the 2025 Master Plan Revisions could result in similar potentially significant impacts on paleontological resources and would be subject to the same mitigation measure (MM-GEO-C3), which would reduce these impacts to a less-than-significant level. Operations under the 2025 Master Plan Revisions would be substantially similar to the 2019 Master Plan and would not affect paleontological resources, no impact would occur.

Conclusion

Impacts related to seismic activity, soil conditions, slopes and erosion would be similar for the 2025 Master Plan Revisions as evaluated for the 2019 Master Plan in the Final EIR and no changes to or additional mitigation is required.

H. GREENHOUSE GAS EMISSIONS

Greenhouse gas emissions associated with the 2025 Master Plan Revisions were evaluated based on a review of the Final EIR. The potential for the 2025 Master Plan Revisions to result in new significant impacts related to greenhouse gas emissions was also evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

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

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Significant and Unavoidable, Tiers I and II

Emissions: Significant and Unavoidable Impact, Tiers I and II

Construction of the 2019 Master Plan would generate emissions of CO₂, CH₄, and N₂O associated with mobile and stationary construction equipment exhaust as well as employee and haul truck vehicle exhaust, which would contribute to cumulative GHG impacts. Mitigation measure MM-GHG-C1 would reduce impacts associated with construction but not below a significant level.

The Final EIR identified annual emissions (including amortized construction emissions) as a result of Tier I to be a net increase of 16,300 MTCO_{2e} per year. Because details of Tier II were not known, emissions from Tier II were not quantified. Operation of the 2019 Master Plan (Tiers I and II) would generate long-term emissions of CO₂, CH₄, and N₂O associated with area sources, energy consumption, motor vehicles, waste generation, and water consumption, which would contribute to cumulative GHG impacts. Mitigation measure MM-GHG-O1 would reduce impacts associated with operation but not below a significant level.

Plans and Policies: Less than Significant Impact, Tiers I and II

The 2019 Master Plan would not conflict with the County of Los Angeles Climate Action Plan, AB 32 and its Scoping Plan, and SB 32 and the 2017 Scoping Plan. Feasible project design and mitigation measures (MM-GHG-C1 and MM-GHG-O1) would further reduce GHG emissions. The 2019 Master Plan would be consistent with and would not frustrate any AB 32 Scoping Plan measures, nor was it determined to be inconsistent in any way with the AB 32 goal of reducing state-wide GHG emissions to 1990 levels by year 2020. As such, the 2019 Master Plan was determined to not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The impact was considered less than significant before mitigation and mitigation measures would further reduce impacts.

2025 Master Plan Revisions

Construction and Operation

Emissions: Significant and Unavoidable Impact, Tiers I and II

Total emissions for the Campus as a whole, including the 2025 Master Plan Revisions, could incrementally increase and impacts would continue to be considered significant. However, consistent with State regulations, as time passes, additional ways of reducing energy consumption for both mobile and stationary sources will be identified and incorporated into the buildout and ongoing operations of the Campus. The same mitigation measures would be required and would continue to reduce impacts to the maximum extent feasible.

Plans and Policies: Less than Significant Impact, Tiers I and II

Total GHG emissions resulting from construction associated with the 2025 Master Plan Revisions would incrementally increase as compared to those evaluated in the Final EIR. The 2025 Master Plan Revisions will be consistent with LA County CAP GHG reduction strategies as applicable. As a result, the 2025 Master Plan Revisions would not conflict with achievement of the County's GHG emissions reduction target. The

net annual operational GHG emissions from the 2025 Master Plan Revisions could incrementally increase as compared to the 2019 Master Plan. However, consistent with State regulations, as time passes additional ways of reducing energy consumption for both mobile and stationary sources will be identified and incorporated into the buildout and ongoing operations of the Campus. The 2025 Master Plan Revisions would be consistent with applicable CAP measures and RTP/SCS policies aimed at reducing GHG emissions, which would minimize the increase in GHG emissions that would otherwise occur without implementation of the various sustainability, energy efficiency, water efficiency, solid waste, and transportation reduction measures. The 2025 Master Plan Revisions would be designed to LEED Gold standards. Therefore, the 2025 Master Plan Revisions would not conflict with the County's ability to achieve the CAP target reduction and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The 2025 Master Plan Revisions would also incorporate the same mitigation measures (MM-GHG-C1 and MM-GHG-O1) as the 2019 Master Plan, which would serve to reduce project related GHG emissions.

Conclusion

Impacts related to GHG emissions would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan, and impacts related to GHG emissions are still considered to remain significant. Impacts related to plans and policies would be less than significant and no changes to or additional mitigation is required.

I. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the 2025 Master Plan Revisions were evaluated based on a review of the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to seven questions recommended for consideration by the *State CEQA Guidelines*. Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		
(b) Creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		
(c) Emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		
(d) Being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Routine Transport: Less than Significant Impact, Tiers I and II

During the construction period, routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and fuels would occur. Such transport, use, and disposal must be compliant with applicable regulations, and with construction BMPs implemented in accordance with a site specific SWPPP required as part of the NPDES General Construction Permit. Operation of Master Plan facilities could increase the use of hazardous materials, including regulated medical waste; however, it's expected they would use, store, handle, and dispose of hazardous materials in a manner similar to how they're used

by existing campus facilities, including the hospital, and their handling and storage would be subject to all hazardous materials laws and regulations already being adhered to.

Accidents and Release of Hazardous Materials and Contaminated Site: Less than Significant Impact with Mitigation Tiers I and II Construction; Less than Significant Impact Tiers I and II Operation

Construction would require the transport, use, and disposal of hazardous materials, which could result in upset or accidents that could release hazardous materials into the environment. Such transport, use, and disposal must be compliant with applicable regulations and with construction BMPs implemented in accordance with a site specific SWPPP required as part of the National Pollution Discharge and Elimination System (NPDES) General Construction Permit. The Los Angeles County Fire Station #04, located within the Campus, was listed on the LUST database with contaminated soil, which was identified as a Potential Environmental Concern (PEC). The presence of USTs in the hospital loading lock and the presence of a paint and solvent spray booth were also identified as PECs. Demolition of structures built prior to 1980 may result in the exposure of the public and/or the environment to lead based paint (LBP) and/or asbestos containing materials (ACMs) in buildings. Implementation of mitigation measures MM-HAZ-1 through MM-HAZ-4 were identified and determined to reduce the potential construction impacts related to hazardous waste to a less-than-significant level.

The Final EIR indicates that compliance with federal, state, and local regulations, in combination with construction BMPs implemented as part of a Stormwater Pollution Prevention Plan, would ensure that operational impacts related to routine transport, use, or disposal of hazardous waste would be less than significant. The Final EIR indicates that implementation of MM-HAZ-1 through MM-HAZ-4 would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to hazardous materials releases. Furthermore, any accidental spills of materials considered hazardous would be confined immediately, with the materials removed and disposed of in accordance with all applicable safety regulations and disposal methods.

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

Additionally, all hazardous materials would be handled in accordance with all applicable rules and regulations. Biomedical wastes would be handled and transported for disposal during operation of future facilities. Current safety protocols for such materials at the Medical Center Campus would be carried forward into the operation of future facilities, and the risk due to the release of biomedical wastes into the environment would be minimal. Therefore, operation of Master Plan facilities was determined to result in

a less-than- significant impact related to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

The PECs identified in for the Campus generally do not pose a significant hazard to or occupants of existing buildings unless the sites are disturbed during construction and hazardous materials are released into the environment. Therefore, operation of future facilities was not expected to result in significant increased hazards to the public or the environment due to the proximity of those facilities to existing PECs and hazardous materials sites.

Hazardous Emissions Near Schools: No Impact, Tiers I and II

There are no schools within 0.25 mile of the Campus. The closest existing school is PUC Lakeview Charter High School, approximately 0.60 mile to the southwest.

2025 Master Plan Revisions

Construction and Operation

Routine Transport: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would use the same construction materials and methods as the 2019 Master Plan and would be required to comply with applicable regulations. Therefore, demolition, grading, and excavation would result in the same potential impacts related to routine transport of hazardous materials. Operation of the facilities would result in routine transport of minor amounts of hazardous materials, the transport of which is well regulated. Therefore, operational impacts would be the same for the 2025 Master Plan Revisions as the 2019 Master Plan.

Accidents and Release of Hazardous Materials and Contaminated Site: Less than Significant Impact with Mitigation, Tiers I and II Construction; Less than Significant Impact, Tiers I and II Operation

Demolition, grading, and excavation would result in the same potential impacts related to accidental release of hazardous materials. The 2025 Master Plan Revisions would continue to be required to comply with applicable regulations and implement Mitigation measures MM-HAZ-1 through MM-HAZ-4, which would reduce impacts related to accidental release to less-than-significant levels, just as they would for the 2019 Master Plan.

Similar to the 2019 Master Plan, operation of the 2025 Master Plan Revisions would require the routine use of limited quantities of hazardous materials and waste routinely used in hospitals and related facilities. The potential for upset and accident conditions resulting in the release of these materials is low and related

impacts are considered less than significant for the 2025 Master Plan Revisions, the same as for the 2019 Master Plan.

Hazardous Emissions Near Schools: No Impact, Tiers I and II

There are no schools within 0.25 mile of the Campus. The closest school is 0.6 miles to the southwest across the freeway; no impact would occur.

Conclusion

Impacts related to hazardous materials management, upsets and accidents, hazardous materials near schools and hazardous sites would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final FEIR; no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(e) Being located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project Area?		
(f) Impairing implementation of or physically interfering 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?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Airport Proximity: No Impact, Tiers I and II

The Campus is not located within two miles of an airport or airstrip. The Campus has its own heliport for use in emergencies.

Emergency Response Plans: Less than Significant Impact, Tiers I and II

During construction activities, the 2019 Master Plan would be required to comply with applicable requirements set forth by the Los Angeles County Operational Area Emergency Response Plan, the Los Angeles County Fire Department, and the Los Angeles County Sherriff’s Department. Additionally, construction would be confined within the existing Campus boundaries. Therefore, construction would not conflict with an emergency response plan or emergency evacuation plan. Operations would also occur within the Campus footprint and would not interfere with emergency response or evacuation in the project vicinity.

Wildland Fires

Wildfire-related issues are addressed under **Section T, Wildfire**, below.

2025 Master Plan Revisions

Construction and Operation

Airport Proximity: No Impact, Tiers I and II

There are no airports or airstrips within two miles of the Campus; no impact would occur.

Emergency Response Plans: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would use the same construction methods on the same site as the 2019 Master Plan and the same regulations would continue to apply. As with the 2019 Master Plan, the 2025 Master Plan Revisions would not adversely affect existing emergency access routes. The 2025 Master Plan Revisions would continue to be required to comply with applicable regulations and would not require new emergency plans beyond those that would normally be implemented to address on-site emergency situations during construction. Therefore, the 2025 Master Plan Revisions would avoid adverse impacts regarding the implementation of existing emergency response plans or emergency evacuation plans. Operation of the 2025 Master Plan Revisions would similarly comply with applicable regulations and would not be expected to create a significant hazard to the public or environment and impacts would be less than significant.

Implementation of the 2025 Master Plan Revisions would not adversely affect existing emergency response plans or emergency evacuation plans, just like the 2019 Master Plan. Impacts would be less than significant, the same as for the 2019 Master Plan.

Wildland Fires

Wildfire-related issues are discussed under **Section T, Wildfire**, below.

Conclusion

Impacts related to airport safety and emergency response plans would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

The potential for wildland fires is addressed in **Section T, Wildfire**, below.

J. HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the 2025 Master Plan Revisions were evaluated in relation to the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines*.

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

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		
(b) Substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Water Quality Standards: Less than Significant Impact, Tiers I and II

During construction, site grading activities and exposed surfaces could cause erosion, temporarily increasing the amount of suspended solids in sheet flow or runoff, which would enter the storm drain system. However, the 2019 Master Plan would be required to obtain and comply with the Construction General Permit from the SWRCB. The analysis for the 2019 Master Plan included a drainage area discharge

model which calculated that peak discharge flow rates would decrease with the implementation of the project, for both Tier I and Tier II.

Groundwater: Less than Significant Impact, Tiers I and II

It is possible that the groundwater in the project area is shallower than 125 feet, however construction is not expected to encounter groundwater and substantial dewatering is not expected to be required. Additionally, any water used during construction would be temporary and limited in quantity. Master Plan development and landscaping would result in an increase in amount of water consumed during operation. Therefore, the impacts on groundwater supplies or recharge during operation were determined to be less than significant. Implementation of MM-HYD-C1 (permanent monitoring wells where groundwater seepage could occur) and MM-HYD-O1 (irrigation above existing to be met by alternative supply to extent feasible to minimize use of potable water) would ensure that impacts would be less than significant.

2025 Master Plan Revisions

Construction

Water Quality Standards: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would use the same construction methods as the 2019 Master Plan and construction activities could result in accidental spills or disposal of potentially harmful materials that could wash into and pollute surface waters or groundwater. These activities would expose soils for a limited time, allowing for possible erosion and sediments to enter into sheet flow runoff, which could enter the existing storm drain system untreated. The 2025 Master Plan Revisions would be required to obtain the same permits as the 2019 Master Plan. Compliance with these permits and requirements would prevent a substantial violation of water quality standards and minimize the potential for contributing additional sources of polluted runoff during construction, just as it would for the 2019 Master Plan.

As with the 2019 Master Plan, the existing regulations, programs, and policies would ensure that water- and wind-related erosion from 2025 Master Plan Revisions construction would be confined to the construction area and not transported off site. They would therefore ensure construction activities would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles RWQCB and/or other regulatory agencies or affect the beneficial uses of receiving waters. This would also result in no exceedance of water quality standards during construction of the 2025 Master Plan Revisions, in the same way as the 2019 Master Plan.

The potential for any spill or release of construction-related chemicals during construction of the 2025 Master Plan Revisions would be the same as under the 2019 Master Plan, that is, generally small because of the localized, short-term nature of the releases. The same NPDES Construction General Permit and SWPPP measures required for the 2019 Master Plan would ensure that these types of materials would prevent a spill or release from the 2025 Master Plan Revisions. Therefore, the potential soil erosion and sedimentation impacts during construction of the 2025 Master Plan Revisions would be less than significant, just like the Final EIR determined for the 2019 Master Plan. The same mitigation measure (MM-HYD-C1) would be required as applicable and would further reduce impacts.

Operation

Operation of the 2025 Master Plan Revisions would be similar to conditions under the 2019 Master Plan. It would use the same landscaping strategies, incorporate LID measures, and adhere to the same regulations regarding runoff. Accordingly, operation of the 2025 Master Plan Revisions would not result in a violation of any water quality standards or waste discharge requirements, would not create substantial additional sources of polluted runoff, and would not substantially degrade water quality.

As with the 2019 Master Plan, the 2025 Master Plan Revisions could increase water demand compared to existing conditions due to the intensified use of facilities, increased number of employees and patients, and greater amount of landscaping on the Campus. The 2025 Master Plan Revisions could result in incrementally increased demand for water as compared to the 2019 Master Plan. The same kind of code-compliant water fixtures and the same type of LID features would be included, and the same kind of drought-resistant plants would be used for the 2025 Master Plan Revisions. Impacts would continue to be less than significant for 2025 Master Plan Revisions, just as they would be for the 2019 Master Plan. The same mitigation (MM-HYD-O1) would continue to be required and would further reduce impacts.

Conclusion

Impacts related to water quality, waste discharge and groundwater would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
<p>(c) Substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:</p> <p>(i) result in substantial erosion or siltation on- or off-site?</p> <p>(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</p> <p>(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?</p> <p>(iv) impede or redirect flood flows?</p>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

Grading and excavation would be required for building foundations, which could affect drainage on the project site, but standard construction-phase BMPs would decrease the potential for any significant erosion or sedimentation from soil disturbance. During operation, new and improved storm drainage pipes and the installation of Low Impact Development (LID) features (bioretention and permeable pavement) would decrease stormwater discharge rates and sediment loads into local storm drains. The Final EIR found these impacts to be less than significant without mitigation.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would require similar grading and excavation for building foundations as other buildings included in the 2019 Master Plan, which could affect drainage on the sites of specific components but would not substantially alter the existing drainage pattern of the site or result in substantial erosion or siltation. The same standard construction-phase BMPs for compliance with NPDES requirements, including a Construction General Permit and SWPPP, would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction, so any erosion and sedimentation would be localized and temporary. With the implementation of these measures to control erosion and sedimentation, construction-related erosion and sedimentation impacts resulting from soil

disturbance would be less than significant for the 2025 Master Plan Revisions, the same as for the 2019 Master Plan.

For each project component, the County is required to identify and implement appropriate LID compliance features and practices and structural BMPs. Therefore, 2025 Master Plan Revisions operations would have less-than-significant impacts related to erosion and sedimentation, the same as for the 2019 Master Plan.

Portions of the Continuum of Care site will be graded and an existing drainage through the site will remain. As with the 2019 Master Plan, neither construction nor operations would substantially increase surface runoff in a manner that would result in flooding. Therefore, the impacts on existing drainage would be less than significant, the same as for the 2019 Master Plan.

Like the 2019 Master Plan, the 2025 Master Plan Revisions would increase the impervious area, include an integrated stormwater management approach, and implement County LID requirements. The volumes of runoff discharge to the County’s storm drain system following buildout of the 2025 Master Plan Revisions would be similar or reduced compared to the 2019 Master Plan and the existing condition. Therefore, impacts of the 2025 Master Plan Revisions related to stormwater capacity and quality would be similar to the 2019 Master Plan, less than significant.

Conclusion

Impacts related to erosion and siltation, runoff and flooding, and stormwater capacity and quality would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
	Yes	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Flood, Tsunami, Seiche: Less than Significant Impact, Tiers I and II

The Campus is located approximately 28 miles from the Pacific Ocean, so there is no risk to the site from tsunamis and the 2019 Master Plan would not exacerbate tsunami hazards. The Pacoima Reservoir, located 4.5 miles east of campus, is unlikely to produce seiches that would affect the project site, and the proposed project would not exacerbate seiche hazards at the reservoir. During construction, erosion of surface materials could increase Temporary Suspended solids (TSS) and other pollutants, as mentioned in the discussion above. Sedimentation and siltation of runoff during the construction period would be addressed through the implementation of standard construction-phase BMPs and compliance with permit and regulatory requirements.

Water Quality and/or Groundwater Management Plan: Less than Significant Impact, Tiers I and II

The 2019 Master Plan would include improvements to stormwater quality through the implementation of a Campus- wide stormwater management system. The Campus is required to adhere to NPDES drainage control requirements during construction and operation as well as to County drainage control requirements. Mitigation Measures MM-HYD-O2 and MM-HYD-O3 would further reduce impacts.

2025 Master Plan Revisions

Construction and Operation

Flood, Tsunami, Seiche: Less than Significant Impact, Tiers I and II

Because of the site location, the 2025 Master Plan Revisions would have similar less than significant impacts with respect to flood hazard, tsunami, seiche, or associated risk of release of pollutants, the same as the 2019 Master Plan.

Water Quality and/or Groundwater Management Plan: Less than Significant Impact, Tiers I and II

As with the 2019 Master Plan, the 2025 Master Plan Revisions would not directly affect groundwater resources, and indirect demands on local groundwater supplies would not exceed available supplies; the 2025 Master Plan Revisions also would comply with LID regulations and would not obstruct implementation of a water quality control plan or sustainable groundwater management plan and therefore impacts would be less than significant.

Conclusion

Impacts with respect to flood hazards, tsunami, seiche and risk of release of pollutants and impacts associated with a water quality control plan and/or groundwater management plan would remain similar to those identified in the Final EIR and no changes to or additional mitigation is required.

K. LAND USE AND PLANNING

Land use and planning impacts of the 2025 Master Plan Revisions were evaluated in light of the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an established community?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Initial Study indicates that the Olive View-UCLA Medical Center Campus Master Plan included development of new buildings and facilities within the boundaries of the existing campus and that no structures would be constructed that would divide an established community. Additionally, existing communities to the south of the campus, across Oliver View Drive, would continue to have access to the hiking and equestrian trails to the north of the campus. Therefore, the Initial Study determined that no impacts would occur, and that further analysis was not necessary in the EIR.

2025 Master Plan Revisions

Construction and Operation: No Impact, Tiers I and II

The 2025 Master Plan Revisions would occur within the Campus with uses consistent with the existing Medical Center use and no impact with respect to dividing a community would occur.

Conclusion

The 2025 Master Plan Revisions would not physically divide an established community and would result in no impact related to physical division of an established community, the same as the 2019 Master Plan and no changes to or additional mitigation is required.

(b) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Final EIR determined that the proposed project would be generally supportive of, or consistent with, applicable plans and therefore, would not conflict with the relevant environmental policies and objectives of the County of Los Angeles General Plan Land Use Element, Mobility Element, and the City of Los Angeles Sylmar Community Plan. In addition, the 2019 Master Plan would be consistent with the current land use designation of Public Facilities and zoning designation of Public Facilities – PF.

2025 Master Plan Revisions

Construction and Operation: No Impact, Tiers I and II

The 2025 Master Plan Revisions would have similar land uses as the 2019 Master Plan and the existing conditions and would continue to be consistent with applicable plans and policies.

Conclusion

There would be no change in the impacts related to consistency with applicable land use plans, policies, and regulations; impacts would continue to be less than significant and no changes to or additional mitigation is required.

L. MINERAL RESOURCES

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to the Final EIR and two questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?		
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: No Impact, Tiers I and II

The Initial Study indicated that the Campus is not within a mineral resource zone and that therefore, the 2019 Master Plan would not result in the loss of availability of a known mineral resource that is of value to the region and the residents of the state. The Initial Study indicated that no further analysis was warranted in the EIR.

2025 Master Plan Revisions

Construction and Operation: No Impact, Tiers I and II

The 2025 Master Plan Revisions would be located on the Campus and therefore would not impact availability of a known resource.

Conclusion

Impacts of the 2025 Master Plan Revisions would be the same as those of the 2019 Master Plan, with no impacts on mineral resources of value to the region and the residents of the state and no mitigation is required.

M. NOISE

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the Final EIR and three questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		
(b) Generation of excessive groundborne vibration or groundborne noise levels?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction

Noise: Potentially Significant and Unavoidable Impact, Tiers I and II

Noise from construction activities could exceed established thresholds and adversely affect noise-sensitive residential uses in the vicinity of the campus. If pile driving occurs during construction, the number of offsite noise-sensitive uses adversely affected by construction activities would increase.

While mitigation measure MM-NOI-C1 and adherence to applicable noise standards will reduce construction noise levels, it will not eliminate the predicted noise impacts entirely; therefore, construction noise impacts were considered significant and unavoidable.

Vibration: Potentially Significant and Unavoidable Impact, Tiers I and II

Heavy construction equipment has the potential to produce groundborne vibration levels that are perceptible to people in the surrounding area. Estimated groundborne vibration levels due to construction of 2019 Master Plan facilities could exceed established thresholds at offsite sensitive residential uses. If pile driving occurs during construction, a greater number of offsite residential uses could be affected. While MM-NOI-C2 would reduce construction vibration levels, it would not eliminate the predicted impacts

entirely; therefore, construction vibration impacts are considered significant and unavoidable for Tiers I and II.

Operation

Noise: Less than Significant Impact with Mitigation, Tiers I and II

2019 Master Plan operational noise sources would include traffic on the surrounding streets and onsite noise sources such as mechanical equipment, parking lot activities, deliveries, and activities at proposed outdoor spaces such as trails and gardens. Because the 2019 Master Plan is conceptual and programmatic in nature, the final type, location, and configuration of mechanical equipment is unknown and the possibility exists that some onsite mechanical equipment would increase ambient noise levels and exceed the applicable noise standards at offsite sensitive receptors.

New on-site mechanical equipment has the potential to produce a substantial permanent increase in ambient noise levels at nearby off-site noise-sensitive receptors, which would be a potentially significant impact; mitigation measure MM-NOI-O1 would reduce this impact to a less-than-significant level for both Tiers I and II.

Vibration: No Impact, Tiers I and II

Activities associated with operation of 2019 Master Plan facilities are not expected to expose sensitive receptors to excessive groundborne vibration or noise. Therefore, the Final EIR determined that there would be no impact to operational groundborne vibration for Tiers I and II.

2025 Master Plan Revisions

Construction

Noise: Potentially Significant and Unavoidable Impact, Tiers I and II

The 2025 Master Plan Revisions address a site farther from sensitive receptors (more than 1,300 feet) as compared to what was analyzed in the Final EIR. Construction of the 2025 Master Plan Revisions would use the same equipment and methods and be in the same general location as under the 2019 Master Plan. Overall, construction activities on the Campus would continue to increase noise levels at sensitive receptors generally the same as under the 2019 Master Plan and could exceed established thresholds.

Even with implementation of mitigation measure MM-NOI-C1, construction noise associated with the 2025 Master Plan Revisions could continue to be above established thresholds in some locations, the same as

under the 2019 Master Plan. Therefore, impacts related to construction noise are considered to continue to be significant and unavoidable for the 2025 Master Plan Revisions.

Vibration: Less than Significant Impact with Mitigation, Tiers I and II

In the same way as the 2019 Master Plan, the 2025 Master Plan Revisions could include the use of heavy-duty construction equipment. The 2025 Master Plan Revisions would also incorporate mitigation measure MM-NOI-C2. While MM-NOI-C2 would reduce construction vibration levels, it may not eliminate the predicted impacts entirely. Therefore, construction vibration impacts continue to be considered significant and unavoidable for the 2025 Master Plan Revisions, the same as determined in the Final EIR for the 2019 Master Plan.

Operation

Noise: Less than Significant Impact with Mitigation, Tiers I and II

Operational traffic for the 2025 Master Plan Revisions would be incrementally increased as compared to under the 2019 Master Plan, however, not sufficiently to noticeably increase noise levels. The Final EIR determined that the increase in noise related to 2019 Master Plan traffic would be less than 3 dBA and therefore less than significant, which would be the same for the 2025 Master Plan Revisions. Therefore, 2025 Master Plan Revisions operational traffic noise impacts would be less than significant, the same as those for the 2019 Master Plan.

Helicopter operations would not be affected by the 2025 Master Plan Revisions and impacts would continue to be less than significant.

The operation of mechanical equipment such as air conditioners, fans, and related equipment for the 2025 Master Plan Revisions would be the same as for the 2019 Master Plan, which may generate audible noise levels at the same levels as determined in the Final EIR. The 2025 Master Plan Revisions would implement MM-NOI-O1, which would reduce noise levels from fixed mechanical equipment to a less-than-significant level, as indicated in the Final EIR.

Vibration: No Impact, Tiers I and II

Stationary mechanical and electrical equipment and passenger vehicle circulation would be the same for the 2025 Master Plan Revisions as for the 2019 Master Plan. Like the 2019 Master Plan, vibrations generated from these sources would be similar to that of existing sources. Therefore, the same as determined in the Final EIR, operational groundborne vibration impacts for operation of the 2025 Master Plan Revisions would be less than significant.

Conclusion

Impacts related to noise and groundborne vibration would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(c) For a project located within-the vicinity of a private airstrip or-an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

The Campus is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The existing helipad on the Campus would remain in the same location northeast of the existing hospital and emergency services buildings. Flight paths associated with the helipad are not anticipated to change and the overall number of helipad operations are not expected to increase as a result of the 2019 Master Plan.

2025 Master Plan Revisions

Construction, Operation, and Conclusion

The same as the 2019 Master Plan, the 2025 Master Plan Revisions would have no impacts related to private and public airport noise and would not affect operations of the helipad.

N. POPULATION AND HOUSING

Population and housing impacts were evaluated with regard to the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant was also evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Inducing substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?		
(b) Displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation

Unplanned Growth: Less than Significant Impact, Tiers I and II

Because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. Additionally, the County has a large pool of construction labor from which to draw within commuting distance of the project site. Therefore, most construction workers would not relocate their households to work on proposed Master Plan development and improvement projects.

The Final EIR indicates that Tier I would include the development of short-term residential treatment facilities and that the growth inducement impacts of this small increase in the residential population would be minor. The SCAG projections anticipate countywide population growth of 19.2 percent by 2035.

The increases in the on-campus employee and residential populations that could occur with buildout of the 2019 Master Plan would not contribute substantially to any population growth in the area beyond what SCAG has projected in its regional and City forecasts.

Additionally, the 2019 Master Plan does not include the extension of roads or other infrastructure improvements outside the boundaries of the Campus that would induce growth in the surrounding area.

Displacement: No Impact, Tiers I and II

All development and facilities under the 2019 Master Plan would be constructed within the existing boundaries of the medical center campus. There were no permanent housing units on campus when the 2019 Master Plan was initiated (or presently). Thus, no displacement of existing housing would occur as a result of anticipated development under the 2019 Master Plan.

2025 Master Plan Revisions

Construction and Operation

Unplanned Growth: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would result in additional short-term residential treatment facilities that would be similar to what was described in the Final EIR and would not result in substantial impacts relative to growth inducement in the area. The 2025 Master Plan Revisions would result in impacts similar to those anticipated for the 2019 Master Plan, with less-than-significant impacts related to the construction worker population. Therefore, the 2025 Master Plan Revisions would have the same less-than-significant impacts related to population growth during construction as determined in the Final EIR.

The 2025 Master Plan Revisions would have similar operational population growth, employment and economic opportunities as the 2019 Master Plan and these impacts would be the same as determined in the Final EIR, less than significant.

Displacement: No Impact, Tiers I and II

The 2025 Master Plan Revisions would have no impacts related to displacement of housing or people because no housing or population would be removed.

Conclusion

Impacts related to population and housing would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

O. PUBLIC SERVICES

Public Services impacts of the 2025 Master Plan Revisions were evaluated based on a review of the Final EIR and one question (relevant to each public service) recommended for consideration by the *State CEQA Guidelines*.

<p>(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p> <p>(i) Fire protection? (ii) Police protection? (iii) Schools (iv) Parks (v) Other public facilities</p>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

POLICE, FIRE AND EMERGENCY SERVICES

2019 Master Plan

Construction: Fire and Police – Less than Significant Impact with Mitigation, Tiers I and II

Construction could temporarily increase demand for police and fire protection services but would not result in the need for new or altered fire protection facilities. Emergency access to the project site could be affected by 2019 Master Plan construction activities. Temporary lane closures and construction related-traffic could delay or obstruct the movement of emergency vehicles. MM-PS-1 (coordination with LAFD, LASD and LAPD) and MM-PS-2 (ongoing coordination with LASD) would ensure coordination and less than significant impacts.

Operation: Fire and Emergency Services – Less than Significant Impact, Tiers I and II
Police: Less than Significant Impact with Mitigation, Tiers I and II

The 2019 Master Plan would be generally consistent with current uses and development was not planned to occur outside the existing Campus boundaries. As a result, the 2019 Master Plan would not require the construction of new or altered police or fire facilities.

The Final EIR identifies the need for ongoing coordination with LASD (MM-PS-2) to reduce impacts on police services to a less-than-significant level. As part of the standard project approval process, the County of Los Angeles Fire Department reviews and approves all project plans to ensure compliance with applicable fire codes and standards including ingress/access requirements, thereby minimizing the risk of increased operational fire hazards. Though LAPD and LAFD are the primary emergency responders to the Olive View-UCLA Medical Center Campus, the plan check reviews are conducted by the County of Los Angeles. The Final EIR indicates that development under the 2019 Master Plan was not expected to substantially increase the demand for public services and require construction of new or altered facilities to maintain acceptable service ratios.

2025 Master Plan Revisions

The 2025 Master Plan Revisions would result in generally the same uses on the Campus as the 2019 Master Plan. The 2025 Master Plan Revisions would comply with County Code and LACFD requirements. As for the 2025 Master Plan Revisions, it would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire station to maintain service.

Construction: Fire and Police – Less than Significant Impact with Mitigation, Tiers I and II

As determined in the Final EIR, impacts of the 2025 Master Plan Revisions on fire protection and emergency services would be less than significant with the identified coordination (MM-PS-1).

Operation: Fire and Emergency Services – Less than Significant Impact, Tiers I And II Police – Less than Significant Impact with Mitigation, Tiers I and II

The 2025 Master Plan Revisions would incrementally add to the Campus-wide increase in the net floor area, employee population, and annual patient visits to the Campus. Impacts on emergency services would be similar to those described for the 2019 Master Plan and would be less than significant.

Conclusion

Impacts related to fire and emergency services would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

SCHOOLS, PARKS, OTHER FACILITIES

2019 Master Plan

Construction: Less than Significant Impact, Tier I and II

Given the large pool of construction workers within commuting distance of the project site, it is unlikely that construction workers would choose to permanently relocate their households to the area, thereby increasing local school enrollment, demand for parks and other facilities. Thus, construction activities are not expected to result in the need for new or altered schools, school facilities, parks or other facilities to maintain acceptable performance objectives. Construction impacts on educational, park and other facilities would be less than significant.

Operation: Less than Significant Impact, Tier I and II

New employees would be expected to be dispersed over a wide geographic area within commuting distance of the campus. Thus, the new households formed by these new employees would not likely result in significant increases in student enrollment at any one school in the region, demand for park facilities at any one park or demand for any other public service at any one facility. Therefore, the indirect impact of these employees on student enrollment and demand for park and other facilities is not expected to require the construction of new schools, school facilities, parks or other facilities to maintain acceptable performance objectives. The temporary residential treatment facilities are not expected to generate or induce population growth such that new or altered schools, school facilities, parks or other facilities would be required. Operational impacts on educational, parks and other facilities would be less than significant.

2025 Master Plan Revisions

Construction, Operations, and Conclusion

Similar to the 2019 Master Plan, the 2025 Master Plan Revisions would not create a demand for schools, parks or other public services that would require new or physically altered facilities. Therefore, there would be no change in the impacts related to schools, parks and other facilities; impacts would be less than significant, the same as for the 2019 Master Plan and no changes to or additional mitigation is required.

P. RECREATION

The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to the Final EIR and two questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?		
(b) Inclusion of on-site recreational facilities or requirement for the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction and Operation: Less than Significant Impact, Tiers I and II

The Final EIR found that it would be unlikely that construction of the 2019 Master Plan would result in the relocation of a substantial number of construction workers and their families such that the use of existing parks would increase to the point of substantial deterioration.

Development of 2019 Master Plan facilities would increase the number of employees and campus visitors and would include residential treatment facilities that would provide for short-term stays. Because local recreational resources are most frequently used by local residents rather than campus employees or visitors or hospital patients, development is not expected to directly result in a substantial increase in use of local parks.

Construction of new landscaped open space areas and other passive or recreational spaces would be limited to the Campus. Staging for construction equipment and activities would not occur off-site. Impacts associated with overall construction are addressed throughout the Final EIR and this document.

2025 Master Plan Revisions

Construction and Operation: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions impacts related to physical deterioration or accelerated deterioration to recreational facilities in the region would be similar to those of the 2019 Master Plan. Construction workers would be present intermittently through the construction process and drawn primarily from the Los Angeles area, thereby resulting in less-than significant impacts, the same as under the 2019 Master Plan.

The 2025 Master Plan Revisions would include similar on-site open space and passive recreational areas as compared to the 2019 Master Plan. No additional substantial effects would occur, and, like the 2019 Master Plan, impacts would be less than significant.

Conclusion

Impacts related to recreation would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

Q. TRANSPORTATION

Transportation and traffic impacts of the project were evaluated in light of the Final EIR and the potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts related to transportation and traffic. These impacts were evaluated in relation to four questions currently recommended for consideration by the *State CEQA Guidelines*. As part of the 2018 *State CEQA Guidelines* updates, the checklist was revised to address consistency with *State CEQA Guidelines* Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. Both the City and County published VMT methodologies in 2020. The traffic analysis below considers impacts of the 2025 Master Plan Revisions as compared to the 2019 Master Plan. Impacts related to delay and level of service are no longer considered impacts under CEQA (although these issues are still considered as part of the overall planning process).

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?		
(b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: *Less than Significant Impact, Tier I*
Less than Significant Impact with Mitigation, Tier II

Construction of the 2019 Master Plan could involve intermittent lane and sidewalk closures, which could impede vehicle, pedestrian, equestrian, and bicycle circulation. No long-term closure of offsite roadways, bicycle or equestrian paths, or sidewalks are anticipated. Mitigation measure MM-TRAF-1 (requiring a traffic control plan for lane or sidewalk closures) would reduce impacts to a less-than-significant level.

Operation: *Less than Significant Impact, Tier I*
Potentially Significant Impact, Tier II

No long-term closure of offsite roadways, bicycle or equestrian paths, or sidewalks are anticipated. Operation of the 2019 Master Plan would increase the volume of vehicles and the amount of traffic at

intersections, freeway mainlines, and freeway ramps. The 2019 Master Plan would also result in a minor increase in transit patronage and use of available transit capacity.

2019 Master Plan pedestrian paths and sidewalks within the campus and along the north side of Olive View Drive would improve local pedestrian circulation.

The Final EIR indicates the Olive View-UCLA Medical Center would generate a total of 9,973 daily trips at the end of Tier I, a net increase of 3,841 new daily trips. No impacts related to delay were identified for Tier I in the Final EIR.

Build-out of the campus under the 2019 Master Plan (Tiers I and II) was anticipated to result in a net increase in building square footage of approximately 1.3 million square feet, throughout the Campus with a net increase of 10,509 daily trips (for a total of 16,641 daily trips). While delay impacts were not quantified, for Tier II the Final ER indicated that Tier II could potentially significantly impact two or more intersections in the area.

2025 Master Plan Revisions

Construction: Less than Significant Impact, Tier I
Less than Significant Impact with Mitigation, Tier II

The 2025 Master Plan Revisions would result in similar construction activity overall as compared to the 2019 Master Plan. Overall daily construction-related trips are anticipated to be similar in total; total construction-related vehicle miles traveled (VMT) could increase incrementally.

The 2025 Master Plan Revisions would implement the same construction methods as the 2019 Master Plan and would be required to implement MM-TRAF-1 (traffic control measures where there are lane or sidewalk closures or removal of parking or similar disruptions) as appropriate, which would continue to reduce impacts to a less-than-significant level.

Operation: Less than Significant Impact, Tier I
Potentially Significant Impact, Tier II

As demonstrated in the *Traffic Impact Analysis Update* (see **Appendix B**), the 2025 Master Plan Revisions changes would result in similar impacts to those that would have occurred under the 2019 Master Plan.

Because of the unique use, trip generation for the proposed Continuum of Care building was estimated using the approach used in the Final EIR for special needs housing: $0.8 (108 \text{ staff} \times 2 \text{ trips per day}) = 173$ trips per day for project staff plus 20×2 trips for visitors = 213 trips per day (about 2% of total trips at the

end of Tier I). Due to the timing of shift changes and the modest number of visitors, few trips are anticipated during the peak hours.

Because the Olive View-UCLA Medical Center is located in the City of Los Angeles and provides services to local City residents (who would have to travel further if services were provided elsewhere), for this EIR the County deferred to the City of Los Angeles (Final EIR page 3.15-21) for the thresholds to be used to evaluate the Olive View-UCLA Medical Center project traffic impacts. The Final EIR was certified in 2019 and still used delay and peak hour Level of Service as thresholds to determine the significance of traffic impacts. The Final EIR identifies less than significant impacts (based on delay) for Tier I traffic, and potentially significant impacts at two – and possibly other -- intersections for Tier II -- post 2035. The Continuum of Care facility would not be expected to change the Tier I level of significance based on delay/Level of Service due to the minimal number of trips during peak hours.

As noted above, since certification of the Final EIR, both the City and County have adopted new thresholds for evaluating traffic impacts based on vehicle miles traveled (VMT). The City's screening threshold for determining whether a new traffic study is needed is a net increase of 250 trips per day. In addition, the City of Los Angeles Transportation Assessment Guidelines (July 2020) indicate public service uses are generally presumed to have less than significant VMT impacts (page 2-7). The County Transportation Impact Analysis Guidelines (July 2020) do not specifically address public service uses and indicate that Public Works would determine the appropriate threshold for such land uses; in this case Public Works is deferring to City guidelines.

The Continuum of Care facility would be required to comply with the traffic mitigation measure requiring preparation of a Traffic Control Plan, MM-TRAF-1 (the Final EIR does not identify any other traffic mitigation measures). The proposed Continuum of Care facility would generate a less-than-significant increase in trips compared to what was previously evaluated. No further analysis of traffic issues is necessary. No changes are proposed to the mitigation measure. Any further changes to Tier I and Tier II development will be subject to further review of potential traffic impacts.

Conclusion

The Final EIR identified less than significant impacts related to Tier I construction and operation, Tier II construction, and potentially significant impacts with respect to Tier II operation. While these impacts were related to intersections and delay-based criteria, the 2019 Master Plan did identify increases in vehicle trips and these increases are still conservatively considered potentially significant for Tier II for purposes of this addendum. Total daily trips and associated VMT would incrementally increase under the 2025 Master Plan

Revisions, but impacts would remain similar to those identified for the 2019 Master Plan; no changes to or additional mitigation is required.

(c) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: *Less than Significant Impact, Tier I*
Less than Significant Impact with Mitigation, Tier II

The increased mixture of heavy construction vehicles and general purpose traffic during construction can result in safety hazards due to a higher proportion of heavy trucks. These hazards are temporary and intermittent however, and implementation of construction contractor safety plans, best management practices, and mitigation measure MM-TRAF-1 would ensure potential hazards would be reduced to a less-than-significant level.

Operation: *Less than Significant Impact, Tiers I and II*

During operation of 2019 Master Plan facilities, upgrades to the Campus would improve design features for Campus visitors and employees. No sharp curves or dangerous intersections would be created, nor would incompatible uses be introduced. Therefore, operational traffic hazard impacts would be less than significant.

2025 Master Plan Revisions

Construction: *Less than Significant Impact, Tier I*
Less than Significant Impact with Mitigation, Tier II

The 2025 Master Plan Revisions would incorporate MM-TRAF-1, requiring a traffic control plan as appropriate, that would continue to result in a less than significant, the same as under the 2019 Master Plan.

Operation: Less than Significant Impact, Tiers I and II

As with the 2019 Master Plan, the 2025 Master Plan Revisions would upgrade Campus roadways and would improve design features for Campus visitors and employees. No sharp curves or dangerous intersections would be created, nor would incompatible uses be introduced. Therefore, operational traffic hazard impacts would continue to be less than significant.

Conclusion

The 2025 Master Plan Revisions would have less than significant impacts related to traffic hazards, the same as under the 2019 Master Plan, and no changes to or additional mitigation is required.

(d) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction : Less than Significant Impact with Mitigation, Tiers I and II

2019 Master Plan construction could require temporary road or lane closures, which could affect emergency vehicle access. However, emergency vehicle access will be maintained. Impacts however will be less than significant with coordination with EMS providers that serve the campus and surrounding communities as described in MM-TRAF-1.

Operation: Less than Significant Impact, Tiers I and II

2019 Master Plan operations of the proposed facilities will not substantially affect emergency access to the Campus and surrounding community.

2025 Master Plan Revisions

Construction: Less than Significant Impact with Mitigation, Tiers I and II

Construction would continue to require temporary lane closures and mitigation measure MM-TRAF-1 would continue to reduce impacts to a less-than-significant level.

Operation: Less than Significant Impact, Tiers I and II

Operation of the 2025 Master Plan Revisions would not have the potential to substantially affect emergency access to the Campus and surrounding community.

Conclusions

Impacts related to emergency access would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

R. TRIBAL CULTURAL RESOURCES

The potential for the proposed 2025 Master Plan Revisions to result in new or substantially more adverse significant was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

<p>Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact with Mitigation, Tiers I and II

The 2019 Master Plan has a moderate potential to affect tribal cultural resources (TCRs) in areas on the Campus not previously disturbed because there are three TCRs, including two villages in the vicinity of the Campus. Mitigation measures addressing impacts to Cultural Resources (MM-CR-1 through MM-CR-6) address tribal Cultural Resources and would reduce impacts to a less-than-significant level.

Operation: Less than Significant Impact, Tiers I and II

Operation of the 2019 Master Plan would not have the potential to further impact resources once construction is complete.

2025 Master Plan Revisions

Construction: Less than Significant Impact with Mitigation, Tiers I and II

The 2025 Master Plan Revisions has a moderate potential to affect tribal cultural resources (TCRs) in areas on the campus not previously disturbed because there are three TCRs, including two villages in the vicinity of the campus. Mitigation measures addressing impacts to Cultural Resources (MM-CR-1 through MM-CR-6) also address tribal Cultural Resources and would reduce impacts to a less-than-significant level.

Operation: Less than Significant Impact, Tiers I and II

Operation of the 2025 Master Plan Revisions would not have the potential to further impact resources once construction is complete.

Conclusions

Impacts related to Tribal Cultural Resources would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

S. UTILITIES

Utilities and service systems impacts of the 2025 Master Plan Revisions were evaluated with regard to the Final EIR. The potential for the 2025 Master Plan Revisions to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to five questions recommended for consideration by the *State CEQA Guidelines*.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact with Mitigation, Tiers I and II

During construction of individual projects implemented under the 2019 Master Plan, water would be consumed by construction workers and activities, e.g., cement mixing and dust suppression, wastewater would be generated by construction workers, and electricity and fuels would be consumed. However, the incremental increase in the consumption of utilities or generation of wastewater during construction would not be permanent and it is not expected that new utility infrastructure would be required to meet this incremental increase in demand.

Tier I would require new on-campus infrastructure to accommodate 2019 Master Plan development, including new water and/or sewer lines to new on-campus buildings. If construction of new water lines occurs at depths where undisturbed native soils would be encountered, the potential exists that unknown buried archaeological or paleontological resources could be encountered and damaged or destroyed (see Cultural Resources and Geology/Soils). Mitigation measure MM-UTL-1 requires coordination with City of Los Angeles Bureau of Sanitation (BOS) prior to the Campus generating a net increase in wastewater to ensure a less than significant impact. Mitigation measures addressing Cultural Resource and geological impacts would also reduce impacts associated with construction of new infrastructure.

Operation: Less than Significant Impact, Tier I potentially significant impact, Tier II (water demand post 2040 and sewer capacity)

The operation of 2019 Master Plan facilities would increase the consumption of utilities. Future water supplies, based on a Water Supply Assessment prepared for the 2019, are expected to be adequate and can accommodate future demand. However, the increase in water supply consumption for projects that could be developed far into the future under Tier II of the 2019 Master Plan is not accounted for in the Urban Water Management Plan projections, which end in 2040. When future projects (i.e., Tier II development projects that would occur beyond the year 2040), are proposed and building plans are developed, LACDPW will be required (MM-UTL-2) to coordinate with the water provider, LADWP, to confirm that adequate water supplies exist to serve these future Master Plan projects.

It is anticipated that the sewer system should be able to accommodate the total flow that would occur under the 2019 Master Plan. However, if public sewer lines serving the campus have insufficient capacity, then the County will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. If BOS determines that there is insufficient capacity in the local sewer lines that would serve an individual future project, then the impact would be considered significant.

The amount of impervious cover would decrease, and landscaped areas would increase as a result of proposed Master Plan improvements. As a result, new off-campus stormwater drainage facilities or expansion of existing facilities would not be required.

Increased electricity, natural gas, and telecommunications due to the development and operation of 2019 Master Plan facilities is not expected to require new or expanded offsite electrical or natural gas infrastructure to meet the increased demand.

2025 Master Plan Revisions

Construction: Less than Significant Impact with Mitigation, Tiers I and II

Over the entire construction period, the 2025 Master Plan revisions would incrementally increase total water, and fuels consumed, and wastewater generated, but daily amounts would be similar to what was anticipated for the 2019 Master Plan. New utility infrastructure would not be required to meet this incremental increase in demand.

The 2025 Master Plan Revisions would require additional new on-campus infrastructure to accommodate the Continuum of Care building, including new water and/or sewer lines, new electrical infrastructure and telecommunications infrastructure. If construction of new water lines occurs at depths where undisturbed native soils would be encountered, the potential continues to exist that unknown buried archaeological or paleontological resources could be encountered and damaged or destroyed. Mitigation measure MM-UTL-1 requires coordination with BOS prior to the Campus generating a net increase in wastewater to ensure a less than significant impact. Mitigation measures addressing Cultural Resource and geological impacts would also reduce impacts associated with construction of new infrastructure.

**Operation: Less than Significant Impact, Tier I
Potentially Significant Impact, Tier II, Water Demand Post 2040 and
(Sewer Capacity)**

The 2025 Master Plan Revisions would incrementally increase demand for all utilities; however, the analysis presented in the Final EIR would not substantially change. The ability of the sewer system to accommodate Tier II projects continues to require additional gauging to confirm availability. Impacts of Tier II on water demand beyond 2040 continue to be unforeseeable and potentially significant.

Impervious cover would be similar, and landscaped areas would be similar as a result of proposed 2025 Master Plan Revisions and new off-campus stormwater drainage facilities or expansion of existing facilities would not be required. Increased electricity, natural gas, and telecommunications due to the development and operation of proposed new Master Plan facilities is not expected to require substantial new or expanded offsite electrical or natural gas infrastructure to meet the increased demand.

Conclusion

As under the 2019 Master Plan, the impacts of the 2025 Master Plan revisions regarding relocating and/or constructing on-site infrastructure would be less than significant and no changes to or additional mitigation is required.

(b) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to having sufficient water supplies available to serve the proposed 2025 Master Plan Revisions and reasonably foreseeable future development during normal, dry, and multiple dry years?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact, Tiers I and II

Construction under the 2019 Master Plan would use water for various purposes; however, the incremental increase in water use would be temporary and not substantial, therefore existing water supplies would be sufficient.

Operation: Less than Significant, Tier I Potentially Significant, Tier II (Post 2040)

The potential increase in consumption due to development under Tier I of the 2019 Master Plan would be consistent with the Los Angeles Department of Water and Power's Urban Water Management Plan (UWMP). However, UWMP projections end in 2040, while the 2019 Master Plan provides a framework for development beyond 2040. Therefore, water supply impacts for projects constructed beyond the year 2040 could be potentially significant. Accordingly, when future projects (i.e., Tier II development projects that would occur beyond the year 2040), are proposed and building plans are developed, LACDPW will be required (MM-UTL-2) to coordinate with the water provider, LADWP, to confirm that adequate water supplies exist to serve these future Master Plan projects.

2025 Master Plan Revisions

Construction: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would incrementally increase total demand for water over the construction period; however, the analysis presented in the Final EIR would not substantially change and impacts would continue to be less than significant.

Operation: Less than Significant, Tier I Potentially Significant, Tier II (Post 2040)

The potential increase in consumption due to the 2025 Master Plan Revisions would continue to be consistent with the Los Angeles Department of Water and Power's Urban Water Management Plan (UWMP). The impact of Tier II development projects would be determined post 2040 based on required coordination (MM-UTL-2) with the water provider, LADWP, to confirm that adequate water supplies exist to serve these future Master Plan projects.

Conclusion

The 2025 Master Plan Revisions could incrementally increase water supply demand but would not affect the conclusions of the Final EIR; no changes to or additional mitigation is required.

(c) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to resulting in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project’s projected demand in addition to the provider’s existing commitments?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact, Tiers I and II

Construction would generate a minor incremental increase in wastewater flows to the City’s wastewater system and therefore a less than significant impact for both Tiers I and II.

Operation: Less than Significant Impact, Tiers I and II

The BOS conducted a preliminary evaluation of potential impacts of the 2019 Master Plan and concluded that the sewer system might be able to accommodate total flow of the project (Tiers I and II), but that further detail gauging and evaluation may be needed as part of the permit process for individual projects to identify a specific sewer connection point.

Operation of facilities under the 2019 Master Plan would result in increased wastewater flows. All wastewater generated on the campus would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity to accommodate the Campus as well as existing commitments.

2025 Master Plan Revisions

Construction: Less than Significant Impact, Tiers I and II

Construction would continue to generate a minor incremental increase in wastewater flows to the City’s wastewater system and therefore a less than significant impact would continue for both Tiers I and II.

Operation: Less than Significant Impact, Tiers I and II

Detailed gauging and evaluation of sewer capacity will continue to be needed as part of the permit process for individual projects to identify a specific sewer connection point. The incremental increase in wastewater would not affect the capacity of the Hyperion Treatment Plant. Impacts would continue to be less than significant for Tiers I and II.

Conclusion

The 2025 Master Plan Revisions would result in an incremental increase in wastewater but would not change the conclusions of the Final EIR. Therefore, impacts of the 2025 Master Plan Revisions on wastewater would be similar; no changes to or additional mitigation is required.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(d) Generating solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Yes	No
(e) Compliance with federal, state, and local management and reduction statutes and regulations related to solid waste?	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

Construction: Less than Significant Impact, Tiers I and II

Given demolition debris and solid waste generated by construction activities would be finite and limited to the construction periods, the 2019 Master Plan would not generate waste in excess of state or local standards or in excess of capacity of local infrastructure.

**Operation: Less than Significant Impact, Tier I
Potentially Significant Impact, Tier II**

During Tier I operation of the 2019 Master Plan, it is expected that the project site would be served by a landfill that has sufficient permitted capacity to accommodate the project’s solid waste disposal needs.

Since Tier II development would include those projects proposed far in the future, beyond the year 2035, it's not possible to determine whether landfills serving the project site would have sufficient remaining capacity that far in the future. Therefore, solid waste impacts for Tier II projects could be potentially significant.

Development under Master Plan would be subject to and comply with AB 939 and other solid waste regulations such as the Industrial Waste Control Ordinance of the Los Angeles Municipal Code, the City of Los Angeles Sewer Allocation (Ordinance No. 166060), and the California Solid Waste Reuse and Recycling Access Act, which governs building permits that oversee the transfer, receipt, storage, and loading of recyclable materials.

2025 Master Plan Revisions

Construction: Less than Significant Impact, Tiers I and II

The 2025 Master Plan Revisions would continue to generate waste consistent with state and local standards and within the capacity of local infrastructure.

Operation: Less than Significant Impact, Tier I Potentially Significant Impact, Tier II

The 2025 Master Plan revisions would not change Tier I conclusions regarding adequacy of available landfill capacity to accommodate the project's solid waste disposal needs.

Tier II development continues to be far in the future, and beyond the year 2035, and it continues to not be possible to determine whether landfills serving the project site would have sufficient remaining capacity that far in the future. Therefore, solid waste impacts for Tier II projects would continue to be potentially significant.

Development under the 2025 Master Plan Revisions would continue to be subject to and comply with AB 939 and other solid waste regulations.

Conclusion

Impacts related to solid waste disposal would be similar for the 2025 Master Plan Revisions as compared to those for the 2019 Master Plan as identified in the Final EIR and no changes to or additional mitigation is required.

T. WILDFIRE

As part of the 2018 State CEQA Guidelines updates, new Wildfire checklist questions were added that pertain to projects that are located in, or near, state responsibility areas, lands classified as very high fire hazard severity zones, and other conditions that could pose a hazard with respect to Wildfire.

Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to being located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and any of the following:		
(a) Substantially impairing an adopted emergency response plan or emergency evacuation plan?		
(b) Due to slope, prevailing winds, and other factors, exacerbating wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?		
(c) Requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?		
(d) Exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EMERGENCY RESPONSE PLANS

2019 Master Plan

Construction: Less than Significant Impact with Mitigation, Tiers I and II

2019 Master Plan construction is not expected to result in any substantial traffic queuing or temporary or permanent closure of roadways that would interfere with emergency response or evacuation. However, during construction, emergency access to facilities within the campus could be temporarily affected. Temporary lane closures and construction related-traffic within the campus could delay or obstruct the movement of emergency vehicles. Mitigation measure MM-PS-1 requiring coordination would reduce impacts to a less-than-significant level.

Operation: Less than Significant Impact, Tiers I and II

2019 Master Plan operations would not result in structures or activities that would substantially obstruct or interfere with emergency vehicles or impair emergency response or evacuation plans.

2025 Master Plan Revisions

Construction: *Less than Significant with Mitigation, Tiers I and II*

Operation *Less than Significant Impact, Tier I*

Mitigation measure MM-PS-1 would continue to reduce impacts associated with the 2025 Master Plan Revisions to a less-than-significant level. Operational impacts would continue to be less than significant without the need for mitigation.

Conclusion

The 2025 Master Plan Revisions would have no change to impacts with respect to impairment of emergency response planning and no changes to or additional mitigation is required.

EXACERBATE WILDFIRE RISK, INFRASTRUCTURE, SIGNIFICANT RISKS

2019 Master Plan

Construction and Operation: *Less than Significant Impact, Tiers I and II*

Construction equipment would require the use of flammable fuels and solvents and operation of construction equipment that could result in sparks, thereby increasing fire risks. However, implementation of best management practices during construction and adherence to County and City regulations and requirements would reduce potential risks. Under existing conditions, the project site includes many potential fire issues. However, implementation of the 2019 Master Plan would result in conversion of existing ignitable fuels to maintained landscapes and would include new ignition-resistant development. In addition, construction would adhere to building codes and improve accessibility within the Campus.

2025 Master Plan Revisions

Construction and Operation: *Less than Significant Impact, Tiers I and II*

Construction and operational impacts would continue to be less than significant without the need for mitigation.

Conclusion

The 2025 Master Plan Revisions would have no change to impacts with respect to the exacerbation of wildfire risk, infrastructure, and associated significant risks; no changes to or additional mitigation is required.

U. GROWTH INDUCING IMPACTS

The Final EIR determined that the 2019 Master Plan project would not result in substantial growth inducing impacts. One of the guiding principles of the 2019 Master Plan is to maximize access to Olive View-UCLA Medical Center facilities. Accordingly, the 2019 Master Plan was anticipated to likely attract additional visitors and consequently potentially indirectly increase growth in the surrounding area. However, the 2019 Master Plan does not include the extension of roads or other infrastructure improvements outside the boundaries of the Campus and was determined to not indirectly induce substantial population growth in the surrounding area. The 2019 Master Plan does not include a substantial housing component or displace any existing populations.

The increase in the employee population that would occur under the 2019 Master Plan was anticipated to fall within SCAG projections. The increases in employee and residential populations that could occur with buildout of the 2019 Master Plan were determined to not contribute substantially to any population growth in the area beyond what SCAG has projected in its regional and city forecasts. Therefore, the 2019 Master Plan was determined to not result in significant growth- inducing impacts on the environment.

Consistent with the Final EIR, the 2025 Master Plan Revisions would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The proposed 2025 Master Plan Revisions would be located in an urban area within the City and County of Los Angeles consistent with permitted uses and densities called for by the General Plan designation of the site. Additionally, the project would be located in close proximity to various public transportation opportunities.

Overall, as indicated in the Final EIR, the 2025 Master Plan Revisions would not result in an increase in the population that could tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the proposed 2025 Master Plan Revisions would not result in significant growth-inducing impacts.

The 2025 Master Plan Revisions would be built in an existing urban setting and served by existing infrastructure and adjacent streets. The 2025 Master Plan Revisions would not provide through access to vacant undeveloped parcels whose development potential could otherwise be enhanced, nor would it require extending or improving infrastructure in a manner that would facilitate off-site growth.

Overall, the 2025 Master Plan Revisions would not remove obstacles to population growth, result in an increase in the population that may tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, the same as discussed in the Final EIR for the 2019 Master Plan, the 2025 Master Plan Revisions would not result in significant growth-inducing impacts.

V. MANDATORY FINDINGS OF SIGNIFICANCE

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

(a) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

The Final EIR indicates that Tiers I and I had the potential to result in significant impacts to nesting birds and roosting bats, protected oak trees, and archaeological resources, including tribal cultural resources. The Final EIR indicates that these impacts can be reduced to a less-than-significant level with the identified mitigation measures.

2025 Master Plan Revisions

The 2025 Master Plan Revisions also would have similar impacts and as with the 2019 Master Plan the 2025 Master Plan Revisions would result in less than significant impacts with mitigation.

(b) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to impacts, which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

The Final EIR determined that the 2019 Master Plan in conjunction with other past, present, and probable future projects could result in significant cumulative impacts with respect to the following:

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

Other than three of the four issue areas where project impacts alone were determined to be significant (see below), the Final EIR determined that the 2019 Master Plan would not have impacts that are *individually limited* but cumulatively considerable. While significant construction noise and vibration impacts were identified for Tiers I and II, impacts were identified as localized and would not contribute to a cumulative impact. All issue areas where impacts were determined to be less than significant were determined to not contribute to any cumulatively considerable cumulative impact.

Air Quality: Tier II pollutant emissions that exceed applicable thresholds would add to emissions from other related projects and cumulative development in the air basin.

GHG: Emissions generated by construction and operational activities under both Tiers I and II are cumulative in nature and would add to cumulative impacts.

Traffic: Tier I and II traffic and other related projects would cumulatively increase congestion in the study area and result in unacceptable levels of service at local intersections, freeway mainline segments, and freeway ramps. As noted in the analysis above, impacts related to congestion and delay are no longer considered significant impacts under CEQA, instead traffic impacts are assessed based on vehicle miles traveled. Hospital facilities serve the public and in the City of Los Angeles are generally considered to have less than significant impacts related to VMT.

Utilities: The proposed project and other anticipated growth in the utility providers’ services areas could require new utility infrastructure or facilities to meet increased demand, the construction of which could result in significant impacts to the environment.

2025 Master Plan Revisions

No new projects have been identified that would substantially change the cumulative analysis identified in the Final EIR. The 2025 Master Plan Revisions are anticipated to have similar impacts relative to cumulatively considerable contribution to the same impacts as the 2019 Master Plan.

(c) Do the proposed 2025 Master Plan Revisions require Subsequent or Supplemental CEQA Documentation with respect to environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2019 Master Plan

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

1. **Air Quality:** Tier II construction and operation. Tier II construction impacts would depend on specific project details including construction schedule and activities, advances in emissions controls and the applicable air quality thresholds. Similarly, Tier II operational impacts would depend on advances in emission controls and applicable thresholds. Because Tier II projects are expected to occur far in the future, and specific details about Tier II are unknown, emissions associated with construction and operational activities under are not reasonably foreseeable. Even with the identified mitigation measures, Tier II could result in construction and/or operational emissions that could exceed regional and/or localized standards. Therefore, the Final EIR identifies Tier II air quality impacts as potentially significant and unavoidable.
2. **GHG Emissions:** Tiers I and II construction and operation. GHG emissions generated during construction and operational activities for both Tier I and Tier II could exceed the 3,000 MT CO₂e

SCAQMD suggested annual threshold. While MM-GHG-O1 would reduce the project's GHG emissions, the Final EIR could not state with certainty that emissions would be reduced below 3,000 MT CO_{2e} threshold and/or below goals of applicable regulatory programs. As such, the Final EIR identifies impacts to be significant and unavoidable.

3. **Noise and Vibration:** Tiers I and II construction. While MM-NOI-1 would reduce construction noise levels, it would not eliminate the predicted noise impacts entirely; therefore, construction noise impacts were identified as significant and unavoidable. Construction vibration impacts could significantly affect nearby noise-sensitive uses, while mitigation measure MM-NOI-C2 would reduce construction vibration levels, it may not eliminate the identified significant impacts entirely, therefore, the Final EIR identifies construction vibration impacts as significant and unavoidable.
4. **Utilities:** Tier II – demand for water beyond 2040, Tier II – waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging and cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity.

Development under the 2019 Master Plan would increase the consumption of water. The Water Supply Assessment concluded that projected water supply during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in the City of Los Angeles's Urban Water Management Plan, can accommodate the projected maximum water demand associated with Tier I and Tier II development. However, the UWMP projections end in 2040, while the Master Plan is intended to provide a framework and vision for development on the Campus that could occur beyond 2040. For projects constructed in Tier II of the 2019 Master Plan, if it is determined that the water supplies are insufficient, and new offsite water infrastructure is required, the Final EIR identified a potentially significant and unavoidable impact. Similarly, development under the Master 2019 Plan would also increase wastewater flows from the Campus that would be conveyed to local sewer lines. The City of Los Angeles Bureau of Sanitation (BOS) conducted a preliminary evaluation of the project's potential impacts on existing wastewater flows, which found that based on the current approximate flow levels, the sewer system may be able to accommodate the additional wastewater flow that could occur due to new development under the Master Plan for both Tiers I and II. However, further evaluation would be needed as part of the permit process to identify a specific sewer connection point. If BOS determines that 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. Since the County cannot compel BOS to conduct further gauging and evaluation, the Final EIR, identifies impacts to local sewer lines as potentially significant and unavoidable.

In addition, Transportation Tier II operation impacts relative to vehicle delay at local intersections were tentatively identified as potentially significant and unavoidable. Impacts to intersections and levels of service are no longer considered significant under CEQA; traffic impacts are now evaluated based on Vehicle Miles Traveled (VMT). The project site is served by two local Metro bus lines and an LADOT express bus; these facilities are anticipated to assist in reducing vehicle trips now and in the future. Public services in the City of Los Angeles are generally considered to have less-than-significant impacts relative to VMT.²

2025 Master Plan Revisions

The 2025 Master Plan Revisions would result in the same significant and unavoidable impacts as the 2019 Master Plan, with the exception of traffic impacts related to delay and level of service which are no longer considered impacts under CEQA:

1. **Air Quality:** Tier II construction and operation. Tier II construction and operational impacts would continue to depend on specific project details including construction schedule and activities, as well as advances in emissions controls and the applicable air quality thresholds. Similarly, Tier II operational impacts would depend on advances in emission controls and applicable thresholds. Therefore, Tier II air quality impacts would continue to be potentially significant and unavoidable.
2. **GHG Emissions:** Tiers I and II construction and operation. GHG emissions generated during construction and operational activities for both Tier I and Tier II could continue to exceed the 3,000 MT CO₂e SCAQMD suggested annual threshold. MM-GHG-O1 would continue to reduce the project's GHG emissions, but emissions would continue to be considered significant and unavoidable.
3. **Noise and Vibration:** Tiers I and II construction. MM-NOI-C1 would continue to reduce construction noise levels but may not reduce them below a level of significance; therefore, construction noise impacts continue to be significant and unavoidable. Similarly, MM-NOI-C2 would reduce construction vibration levels, but may not reduce them below a level of significance. Therefore, construction vibration impacts would continue to be significant and unavoidable.
4. **Utilities:** Tier II demand for water beyond 2040, Tier II waste disposal after 2035, and even though available capacity was preliminarily identified potential sewer line capacity subject to further gauging,

² City of Los Angeles Department of Transportation (LADOT), *Transportation Assessment Guidelines*, July 2020, page 2-7. Available online at: https://ladot.lacity.gov/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf, accessed February 27, 2025.

cumulative impacts to utility providers: water, sewer, wastewater, stormwater, solid waste, natural gas and electricity.

Development under the 2025 Master Plan Revisions would continue to result in a demand for utilities similar to what was identified in the Final EIR. Impacts would continue to be considered significant for Tier II as identified in the Final EIR.

As a public facility serving the City of Los Angeles, Tier II traffic impacts related to VMT are anticipated to be generally less than significant but will continue to be evaluated as each Tier II project is considered for approval.

W. CONCLUSION

The 2025 Master Plan Revisions described in Section 2 of this Addendum would be within the assumptions analyzed in the Final EIR. The 2025 Master Plan Revisions have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions (identified in **Section 1**) apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified Olive View-UCLA Medical Center Campus Master Plan Final EIR is the appropriate environmental documentation under CEQA for the 2025 Master Plan Revisions.

Section 3 discusses issue-by-issue how the impacts anticipated for the 2025 Master Plan Revisions would be within those previously identified in the Final EIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIR would continue to apply as appropriate to the 2025 Master Plan Revisions to ensure that all impacts are reduced as necessary and feasible.

As discussed throughout this Addendum (see, in particular, the summary presented in **Table 3**), the 2025 Master Plan Revisions would result in environmental impacts within those analyzed for every issue with implementation of applicable Project Design Features and mitigation measures as included in the adopted MMRP for the 2019 Master Plan.

4. REPORT PREPARATION

A. LEAD AGENCY

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JESSICA KIRCHNER, AICP

CEO & Managing Principal



EDUCATION

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

Bachelor of Arts, Journalism, Rutgers University

AFFILIATIONS

Association of Environmental Planners, Board Member, Legislative Committee

American Institute of Certified Planners, Certified Planner

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

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

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

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

BRETT POMEROY

Associate Principal



EDUCATION

Bachelor of Science, Natural Science, Loyola Marymount University

AFFILIATIONS

Association of Environmental Planners (AEP)

CEQA and NEPA workshops and conferences

Completed AERMOD Dispersion Modeling Training Seminar held by Lakes Environmental

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

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

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

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

Wendy Lockwood

Education

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

Professional Affiliations

Association of Environmental Professionals
Los Angeles Conservancy
American Planning Association

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

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

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

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

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

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

APPENDIX A1

Biological Resources Memorandum

December 19, 2024

Ms. Wendy Lockwood
Sirius Environmental
1478 N Altadena Dr.
Pasadena, CA 91107
wl@siriusenvironmental.com
Transmitted Via E-mail



Biological Assessment Services

Subject: EIR Biological Section Evaluation at Olive View Medical Center, Sylmar CA.

Dear Ms. Lockwood:

Introduction

The Olive View Medical Center Master Plan was approved in 2019. Revisions to the Master plan are proposed, identified as the 2025 Master Plan Revisions. These are limited to the site proposed for the Continuum of Care facility and associated parking; the remainder of the Campus would generally continue to be developed as described in the Master Plan. Hereafter the 2025 Master Plan Revision Area will be called the project area.

Because the biological resources surveys for the Master Plan were conducted in 2017 a review of the current biological conditions on the project area is warranted. The original report mapped the area now identified as the project area as disturbed. This letter reports on the biological conditions in the proposed project area. A brief floral and faunal survey of the site was conducted on December 5, 2024. The purpose of the survey was to determine the general biologic character of the site and to determine the potential for any significant biological impact resulting from change of use on the site. This report is not intended to thoroughly catalogue all species present on the property. The site was walked on foot and the entire site was accessible. The sky was clear and the weather mild, with temperature steady in the low 70s°f. The principal concern was to determine if any listed Threatened, Endangered species, or other biological resources protected by local, state, or federal regulations were present on the site and if habitat for these species occurs there. Additionally, the previously prepared biological report and the applicability of the mitigation measures was evaluated.

Site Description

The site is located on the campus of the Olive View Medical Center in the Sylmar region of Los Angeles. As described in the previous report, the project area is largely disturbed and mostly paved parking areas and roadways. These have been largely abandoned and unmaintained resulting in many areas where native soils are present, and the pavement has degraded to a gravel-like substrate. Portions of the survey area between and adjacent to the paved sections are occupied by native soils. Three sides of the proposed project site are occupied by other medical center facilities or other county agency facilities. North of the project site is undeveloped natural habitat preserved as parkland.

Vegetation

Within the project area there are no intact natural habitats, the vegetation present consisting of a mix of ornamental and native trees, shrubs, and herbaceous species. These include individual native trees and shrubs that are subject to County and City protection. The understory is primarily nonnative weeds and grasses. The native trees/shrubs noted are coast live oak (*Quercus agrifolia*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*), holly-leaf redberry (*Rhamnus ilicifolia*), and blue elderberry

(*Sambucus mexicana*). Oaks are protected by both the City and County, Elderberry and Toyon are protected by the City.

Native scrub and herbaceous species noted include Telegraph weed (*Heterotheca grandiflora*), deerweed (*Acmispon glaber*), California sagebrush (*Artemisia californica*), yerba santa (*Eriodictylon crassifolium*), California sunflower (*Encelia californica*), Wright's cudweed (*Pseudognaphalium microcephalum*), California everlasting (*Pseugognaphalium californicum*), small-flowered nightshade (*Solanum americanum*), wild cucumber (*Marah macrocarpa*), thornapple (*Datura wrightii*), tansy phacelia (*Phacelia tenacetifolia*), and false bindweed (*Calystegia macrostegia*).

The remainder of the species observed on the site are nonnative and will only be identified by common name. Most of the larger trees and shrubs present appear to be the result of intentional planting or volunteers from landscape plantings. These include blackwood acacia, Bailey's acacia, Chinese elm, Canary Island palm, European olive, oleander, eucalyptus, common myrtle, lantana and cape honeysuckle. Brittlebush found in this area is a species native to California but not native to the site. Tree tobacco and castor bean are two larger nonnative and invasive species present. The remainder of the nonnative species present consists of naturalized annual grasses and weeds including wild oats, mustards, tumbleweed, and tocalote.

Wildlife

The highly urbanized character of the site and surrounding area resulted in relatively few wildlife observations. Only one reptile, the western fence lizard was observed. No mammals were directly observed on the property but diagnostic sign (tracks, scat, burrows, etc.) of the deer mouse, pocket gopher, California ground squirrel, dusky-footed woodrat, bobcat, and coyote were observed. Several other common urban mammals are likely to use the property including eastern fox squirrel (*Sciurus niger*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*).

The presence of mature trees makes the site useful to many common urban bird species. Because the survey was quite brief a small sample of the many bird species expected to use the site were recorded. The following native bird species were observed during the brief survey:

house finch	lesser goldfinch
Anna's hummingbird	yellow-rumped warbler
northern mockingbird	scrub jay
California towhee	common raven
white-crowned sparrow	acorn woodpecker
red-shouldered hawk	red-tailed hawk
broad-winged hawk	California quail
red-breasted sapsucker	western meadowlark
phainopepla	ruby-crowned kinglet
mourning dove	

Other Sensitive or Regulated Resources

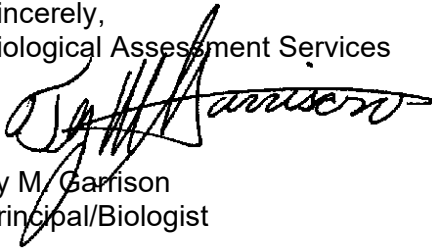
Per mitigation measure MM- Bio-3 a jurisdictional delineation should be conducted prior to development of the proposed project. While no formal delineation was conducted, I am qualified to do so and have identified a small streamcourse or jurisdictional water present south of the northern extent of Hillside Drive. Were this area impacted, permits from the US Army Corps of Engineers, California Department of Fish and Wildlife, and California Regional Water Quality Control Board would be required. However, the project design team indicates that the streamcourse will be avoided, therefore no interaction with these agencies is required.

Conclusion

No species listed as Rare, Threatened, or Endangered by state or federal governments were found on the property or are thought likely to occur there. An analysis was made of the likelihood of listed species occurring there based on known range and habitat preferences of these species. The project site is urban in nature and is mostly surrounded by urban uses and has no value as habitat for endangered, rare or threatened species. Mitigation measures MM-Bio-1-5 address all biological resources found within the 2025 Master Plan Revision project area. The only modification to these mitigation measures necessary is to add other protected trees and shrubs to the arborist report and subsequent permitting process described in MM-Bio-5.

It is a pleasure working with you and I look forward to the opportunity to continue assisting with this project if necessary.

Sincerely,
Biological Assessment Services



Ty M. Garrison
Principal/Biologist

Ty M. Garrison

Education

M.S., Plant Ecology,
California State University at Long Beach, 1991
B.S., Biological Sciences,
University of Redlands, 1981



Experience

Mr. Garrison has over 35 years of experience in the application of environmental principles and regulatory requirements to the planning process. He has worked closely with both private planning firms and public planning agencies on projects ranging from simple lot splits to large master-planned developments. His recent experience includes major public projects (railroad and highway improvements) and utilities (various pipelines, cellular communications towers, and fiber optic communications lines).

As an environmental permitting specialist, Mr. Garrison has developed effective working relationships with local, state, and federal agencies throughout southern California. He has also participated in land use planning and development decisions for many communities in southern California, including developing specific plans and general plans, analyzing open space environmental constraints and wildlife corridors, and planning in environmentally sensitive habitats.

Mr. Garrison is a member of the Los Angeles County Significant Environmental Area Technical Advisory Committee (SEATAC). In accordance with LA County General Plan, the SEATAC reviews all proposed development that may affect any of the identified Significant Ecological Areas in the County. The SEATAC holds public meetings to discuss the projects and provides technical guidance to the project applicants, the County Planning Commission, and the County Board of Supervisors.

Mr. Garrison also served as a member of the Oak Woodlands Habitat Conservation Strategic Alliance (Alliance). In accordance with the California Oak Woodlands Conservation Act (AB 242), Los Angeles County (County) was required to develop an Oak Woodlands Conservation Management Plan (Plan) in order to qualify for funding to preserve oak woodlands through the Oak Woodlands Conservation Fund. The Alliance, which consisted of a respected group of biologists, arborists, environmentalists, foresters, planners, Building Industry Association (BIA) representatives, and academics that were chosen to develop the plan for the County. The Alliance, which represents a significant and unprecedented collaborative effort, donated over 5,000 volunteer hours and completed the Plan in May 2011.

Educating and mentoring young biologist and environmentalists, as well as the general public, has always been a gratifying component of Mr. Garrison's career. Having the opportunity to teach Environmental Law, Policy, and Regulation at Whittier College as an adjunct professor was a fulfilling expansion of Mr. Garrison's desire to share his knowledge and experience regarding the environment and our place within it.

In addition to the pre-project surveys, documentation and permitting expertise, Mr. Garrison has extensive experience implementing the plans, measures, and conditions placed upon a project. Mr. Garrison has monitored many construction projects for all aspects of environmental compliance including adherence to SWPPP measures, biological resource monitoring and reporting, wildlife relocation, site restoration, and agency reporting.

The following pages provide more detailed descriptions of some of the larger and more diverse projects in Mr. Garrison's career.

Biology Subject Matter Expert (SME), Southern California Edison, Devers to Colorado River Transmission Line Project.

The Devers to Colorado River transmission line project consisted of the construction of 154 miles of 500kv transmission line that, despite the title, spanned the distance from the Colorado River to the Valley Substation near Hemit CA. The project is designed to conduct power from the burgeoning renewable energy projects in the desert to SCEs local distribution system. The project included the development of two new substations and nearly 1000 towers. Mr. Garrison provided review and revision of various previously prepared resource management plans, liaison with resource management agencies (BLM, FWS, CAFWS, CPUC, etc.), and management of the biological consultant's team of field biologists. As part of the natural resources management team for the project Mr. Garrison was specifically charged with managing the biological monitors for the 111-mile segment from the Colorado River to the Devers Substation in Desert Hot Springs CA. This duty included but was not limited to insuring compliance with all permit conditions, reviewing daily monitoring reports, communicating with resource agencies when protected species were encountered, and investigating impacts to sensitive resources.

Permitting and Environmental Documentation for Fiber Optic Network, Level 3 Communications, (CA and NV)–Permitting and CEQA Documentation Manager

The Level 3 Communications project consists of environmental and right-of-way permitting for the construction, operation, and maintenance of a buried fiber optic cable that is part of a nationwide long-haul communications network. Duties included biological resource surveys, Biological Assessment preparations, biological permitting, and construction monitoring. The project traversed seven counties and three states. Biological permits and agreements required included Federal Endangered Species Act Section 7 Consultations, State Endangered Species Act 2081 Take Permits, Clean Water Act Section 404, 401, 202(p) Permits, California Fish and Game Code Section 1603 Agreements and many local and regional compliance issues Mr. Garrison also oversaw preparation of CEQA documentation for in-line amplification sites along those routes. The California portions of these routes include many sensitive biological and cultural/historical resources, and require approval of the California Public Utilities Commission. The permitting process and environmental documentation have involved Mr. Garrison's extensive and intensive coordination, consultation, and negotiation with the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFG), the U.S. Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Army Corps of Engineers (USACE).

Mr. Garrison's involvement in the southern California portion of the project began at the design stage and continued through construction completion. The first assignment was to select several potential routes and evaluate their levels of environmental sensitivity. In many areas this required conducting directed surveys for rare, threatened or endangered species. Mr. Garrison then directed the preparation of the Biological Assessments and the biological portions of the Environmental Assessments for each line. While negotiating the permits described above, Mr. Garrison initiated the development of several environmental training programs for construction workers and biologist that would be working on the project during construction. The project eventually required 128 biological monitors onsite during construction and all construction workers required environmental awareness training. Biologist training educated biologist from outside the region on what sensitive species occur in the area and when and where they were likely to be encountered along the project route. One training program allowed biologist to be authorized by the FWS to handle the Endangered desert tortoise. As FWS, CDFG, and BLM designated project biologist Mr. Garrison was responsible for overseeing biological monitoring and reporting to the permitting agencies through the conclusion of construction.

Avian Specific Work Experience

Mr. Garrison has conducted hundreds of biological surveys that included general assessment of avian resources and bird species noted within the project area. He has also conducted nesting bird surveys for dozens of small projects throughout southern California. These surveys were designed to locate and identify existing bird nests prior to the onset of project activities in order to provide protection for the birds and their nests. One of the largest of these projects included 400 acres of high desert land in the Antelope Valley that was slated for construction of a sewage treatment plant. Mr. Garrison and his team located all of the nests within, and adjacent to, the action area and placed construction buffers around the nests as

required by CDFW. On a related project, Mr. Garrison and his team surveyed thousands of acres of high desert land and in the Antelope Valley for bird nests in preparation for agricultural conversion using reclaimed water. The land had been farmed in the 1930s but had been fallow since, allowing some desert flora recruitment and subsequent faunal establishment. One major component of this project was the location of burrowing owl burrows and the construction of artificial burrows so that the owls could relocate to the new burrows when the old, concrete-asbestos, irrigation pipes that the owls had been using were removed.

Additionally, Mr. Garrison has supervised teams of biological and avian monitors on large construction projects such as the SCE transmission line described below. On that project part of Mr. Garrison's duties included interacting with resource management agencies regarding potential impacts to nesting birds as a result of construction activities. One of the primary duties in that regard was to formulate reasonable requests for nest buffer reductions when warranted by the proposed construction activity and the species of bird and nest location, among other factors. Other duties included determining the course of action when required to rescue birds in distress and reporting on avian mortalities. Most of the avian mortalities were a result of collisions with transmission lines but one eagle was killed by a collision with an adjacent wind turbine.

Mr. Garrison has held a California gnatcatcher recovery permit but he has allowed that permit to lapse because he was not actually conducting California gnatcatcher surveys, but was hiring or supervising others to conduct those surveys.

Base Realignment and Closure (BRAC) Studies

As part of the BRAC process Mr. Garrison conducted several on Camp Pendleton to support the realignment of troops and support from other locations. Included in these studies were a hangar firefighting system cleanup and disposal study that included the design of a several mile-long storage/disposal pipeline between MCAS Camp Pendleton and the nearest treatment plant. Mr. Garrison also conducted numerous feasibility studies involving the demolition or reuse of facilities on the Station. These studies included the evaluation of potential human impacts of hazardous materials and the potential to impact several sensitive wildlife species in residence adjacent to the Station.

Environmental Documentation for Regional Communication System (RCS), San Diego County (CA)

Prepared environmental documentation for five new telecommunication sites in San Diego County. The project is part of a larger system of improvements to the County's RCS that are needed to eliminate areas in the County from which radio communication is impossible, and to provide a radio system that allows communication between all of the emergency service providers in the area. Prepared agency notifications, public notification, Application for Environmental Initial Study, Environmental Initial Study/Negative Declaration, CDFG De Minimus form (Certificate of Fee Exemption), Notice of Completion, Notice of Determination, and Public Review Release Form. Several of the sites also required the preparation of a visual and aesthetic analysis in accordance with guidelines of the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans).

As-Needed Environmental Services, City of San Diego (CA)–Senior Biologist

As senior biologist and environmental scientist, directed staff and directly assisted City engineers on 19 projects. Conducted general biological resource assessments and sensitive species surveys and obtained environmental permits. In Penasquitos Lagoon, monitored the emergency repair of a broken sewer main and negotiated the following resource permits for the project: 404 Permit (USACE); 1601 Agreement (CDFG); Temporary Use Permit (California Department of Parks and Recreation); and a Coastal Permit (California Coastal Commission). A large fine threatened by the EPA was avoided due to Mr. Garrison's efforts. He also prepared the mitigation and revegetation plan and mitigation monitoring plan for the project. At Adobe Falls, he conducted an impact analysis for sewer line access road construction, which required general biological surveys and focused California gnatcatcher surveys and sensitive plant inventories. Mr. Garrison had similar duties on the remainder of the projects completed as part of this contract.

As-Needed Biological Services for San Diego County Department of Public Works (CA)– Senior Biologist

As senior biologist and environmental scientist, conducted biological survey and monitoring for five County projects. For the Dehesa Road culvert replacement, directed California gnatcatcher surveys and wetland delineations. For the Central Avenue Bridge replacement, supervised the relocation of mature trees, construction monitoring (environmental), and revegetation monitoring. For the Bonita Bridge replacement, monitored construction and revegetation. For the Kitchen Creek Bridge replacement, prepared a revegetation plan and monitored Revegetation. For the Spring Valley Sewer Outfall mitigation monitoring project, significantly modified an existing revegetation plan and monitored revegetation.

Resource Management Plan (RMP) for Montgomery Field, San Diego (CA)

Prepared the RMP for Montgomery Field (a general aviation airport) in the manner approved by the USFWS and agreed to by the USACE, the CDFG, and the City of San Diego. The purpose of the RMP was to inventory the biological and cultural resources existing within the airport boundaries and to immediately protect potentially significant areas from accidental disturbance. The RMP was crafted to protect and enhance (where possible) substantial resources while meeting safety criteria of the Federal Aviation Agency (FAA) and maintaining airport operations. The RMP was written as a “living document” that will allow airport operations, construction activities, and natural resources to evolve together over the years to come. As negotiated with the USFWS, the precise contents of the RMP were not finalized until there was a clear understanding of the existing biological resources at the Airport. Once the report elements were finalized, a preliminary draft RMP was prepared that includes a discussion of biological and cultural resources issues and detailed specific construction monitoring actions for the first five years of the program.

China Lake Naval Weapons Station Revegetation Test Program, CA

China Lake encompasses many different habitat types that are subjected to a wide range of disturbances including explosive detonations, vehicle maneuvers, and fire, among others. The program was designed to develop revegetation strategies for the range of habitats and disturbances encountered.

City of Carlsbad Habitat Conservation Plan, CA

Prepared habitat conservation plan to compensate for projected impacts of the City of Carlsbad’s proposed public golf course. Golf course development would impact wetland and riparian, native grassland, and coastal sage scrub habitat. These habitats are occupied by numerous sensitive species including the Threatened California gnatcatcher. The habitat conservation plan proposed preservation and restoration of the full compliment of locally native habitats located around city-owned Calavera Lake. Much of the native habitat around Calavera Lake had been disturbed by agriculture, non-native species invasion, off-road vehicle activity, and illegal dumping. Methods proposed to restore the site included topsoil salvage and relocation from the impact site, non-native species removal, and native species reintroduction. A long-term management plan that included vehicle exclusion, maintenance, and monitoring was also developed.

City of Glendora Forensic Environmental Documentation

While conducting biological surveys on the Hughes property at the northern terminus of Loraine Ave. in 1989, Mr. Garrison discovered a population of the Endangered thread-leaved brodiaea (*Brodiaea filifolia*). The species had not been previously documented in the area except by one cryptic reference to a location in the “foothills above Glendora” from 1926. The new discovery eventually led to the establishment of a park and preserve on the site. Subsequently Mr. Garrison conducted surveys on other properties in the Glendora foothills and discovered other populations of the species. The most notable population was located on and adjacent to Guard Ranch, in the vicinity of what is now known as Gordon Highlands Road, Ferguson Motorway, and Wildwood Motorway. This discovery and subsequent negotiations led to the permitted development of “Guard Ranch” now called Gordon Highlands, with conservation easements for the Brodiaea.

Many years later, Mr. Garrison was asked by the City to prepare a detailed account of the permitting history and subsequent permit condition violations on the Guard Ranch property. After detailed and exhaustive research, the resulting tome was submitted to the City for their use.

Section 1600 and/or Section 404, CA

Delineated areas sensitive due to Section 1603 (California Fish and Game Code) and/or Section 404 constraints on numerous projects in Southern California. Assessments involve a practical knowledge of EPA/ACOE wetland determination criteria, including soil sampling, vegetation analysis, and hydrological data interpretation.

General Biological Resource Assessments

Conducted more than 100 general biological resource assessments of parcels in size from less than one acre to more than 10,000 acres. Assessments involve identification of any sensitive species or resources potentially occurring on the project site, field investigations, assessments of project impacts to natural resources, and proposal of measures to mitigate project impacts.

Oak Tree Surveys, CA

Conducted oak tree surveys in accordance with the standards of many Southern California municipalities. Studies have ranged in size from four to over 6,000 trees.

Transplant Programs, CA

Performed two transplant programs involving the relocation of rare plants (*Dudleya multicaulis*, *Brodiaea filifolia*) from development sites to designated open space locations.

Endangered Species Assessments, CA

Conducted many assessments involving rare, threatened, and/or endangered species. Studies involved habitat assessments, field identification of species, impact determinations, mitigation development, and agency coordination.

Discovered previously unrecorded populations of the State Endangered thread-leaved Brodiaea (*Brodiaea filifolia*) in the foothills of Glendora.

City of Adelanto General Plan, CA

Developed general plan guidelines for the newly incorporated City of Adelanto. Guidelines included the preservation of major natural drainage courses, wildlife movement corridor/habitat linkage protection, and Endangered and sensitive species habitat preservation.

City of Mission Viejo, CA

Developed guidelines for the use of undeveloped open-space areas in the City of Mission Viejo.

Microecological Investigations, CA

Conducted several investigations on the effect of minor microecological variations on both floral and faunal community structure.

Thousand Pines American Baptist Outdoor Center, CA

Designed, supervised, and constructed three miles of hiking trails at Thousand Pines American Baptist Outdoor Center in the San Bernardino Mountains. Authored and illustrated trail guidebook emphasizing ecological awareness.

Professional Endeavors

Biological Assessment Services – Full time 2010 – Present.

SEATAC

Los Angeles County Significant Ecological Area Technical Advisory Committee – 2003 - Present

SWCA Inc. - 2009-2010

Land Design Consultants – 2001-2009

HDR Engineering, Inc. – 1998-2001

P&D Consultants – 1994-1998

Biological Assessment Services, Owned and Operated – 1990—1994 Present; Part Time 1994 - 2010

The Planning Center – 1988-1990

Michael Brandman Associates – 1986-1988

LSA Associates – 1985

Independent Consultant – 1982 - 1985

Professional Affiliations

California Native Plant Society

California Oak Foundation

Publications

Seasonal Dormancy in *Dudleya parva* (Master's thesis)

Hundreds of Biological Reports entered into the public record as part of the environmental review, entitlement, permitting, and reporting process.



ONYX ARCHITECTS

13 March 2025

Parisa Dadmehr, CCM
Capital Projects Manager
Los Angeles County Public Works

PROFESSIONAL DESIGN AND ENGINEERING SERVICES, PW 15742
OLIVE VIEW UCLA MEDICAL CENTER CONTINUUM OF CARE FACILITY – ARBORIST AND LANDSCAPE
PROJECT ID 00002628, P96465HR
ONYX #P21116.cs07

Dear Parisa:

We are pleased to provide you with the attached Protected Tree Report, Tree Protection Plan and Tree Planting Plan for the above-referenced project – see Attachments A and B.

ATTACHMENT A - TREE PROTECTION REPORT

As described on page 4 of the Tree Protection Report, the quantities of replacement trees were based on the City of Los Angeles Preservation of Protected Trees Ordinance 186,873. That ordinance requires that removal of protected Oak Trees will require planting of replacement Oak trees at a ratio of 4 (min. 15 gallon size) replacement oaks for every oak removed. It also requires replacement of 4 (min 15. Gallon size) Toyon for every Toyon removed, and 2 (min. 15 gallon size) Elderberry for every Elderberry removed.

INITIAL BASIS OF TREE REPORT – CITY OF LA STANDARDS

The original scope for the report was to study the replacement requirements according to City and/or County standards, whichever were considered more stringent. The Tree Report Summary (page 9 of Attachment A) describes City of LA Standards for replacement as:

- Removal of 11 Coast Live Oaks and replacement with 44 Coast Live Oaks (min. 15 gallon size)
- Removal of 6 Toyons and replacement with 24 Toyons (min. 15 gallon size)
- Removal of 2 blue elderberries and replacement with 8 blue elderberries (min. 15 gallon size)

ALTERNATIVE FOR DESIGN_BUILD SCOPING DOCUMENTS – LA COUNTY STANDARDS

The County of Los Angeles has a lower replacement rate of 2 Oaks replaced (15 gallon size) for every Oak removed, and no replacement required for Toyon or Elderberry removal.

Therefore it is recommended that the design-build scoping documents provide for 2 alternative scopes of protected tree/shrub mitigation and replacement:

- Alternative #1 is scoping per the City of LA Standards and described above.

- Alternative #2 is scoping for County of LA Standards, where replacement is summarized as follows:

- Removal of 11 Coast Live Oaks and replacement with 22 Coast Live Oaks (minimum 15 gallon size)
- Removal of 6 Toyons, no replacement required
- Removal of 2 blue elderberries, no replacement required

ATTACHMENT B - TREE INVENTORY DEMOLITION AND REPLACEMENT PLANS

The plans were developed based on information provided in initial scoping plans for the site and buildings as prepared by HMC Architects for this project. Upon further consultation, with HMC, it was determined that a reasonable circulation plan for the southern parking lot would be to move the easternmost entry/exit driveway westward to form a 4-way intersection with Hillside Dr. and Bucher Ave. The protection and planting plans prepared by Troller Mayer Associates reflect this driveway location at the intersection. It is recommended that the DBE prepare 2 alternatives for scope and cost estimates, as described on the plans and as follows:

ALTERNATIVE PLANTING PLAN #1 – CITY OF LA STANDARDS

The original scope of work studied tree replacement based on City of Los Angeles Standards. At the top of sheet L-1.2, the Plant Legend and Table titled “Alternative #1 (City of Los Angeles Standard)”, show the quantities of replacement trees, with their symbols represented on the site plan as potential replacement locations. This includes 44 Coast Live Oak, 24 Toyon, and 8 Elderberry trees/shrubs of a size to be determined in consultation by the DBE with the Dept. of Urban Forestry, should the City of LA standards be utilized. Note that although the City Standards only require min. 15 gallon size replacements, the planting plan recommends min. 24” box, and it is the 24” box that should be used for scoping purposes.

ALTERNATIVE PLANTING PLAN #2 – COUNTY OF LA STANDARDS

On sheet L-1.2, Table titled “Alternative #2 (County of Los Angeles Standard)”, shows the quantities of replacement trees, with their symbols represented on the site plan as potential replacement locations. This includes the planting 22 Coast Live Oak of a minimum 15 gallon size. There is no County requirement to replace Toyon or Elderberry. Therefore, should the Alternative #2 scope be approved by LACoDPW for use on this site, only 22 oak total trees will be replaced, and the Toyon and elderberry replacement on the plan can be deleted. Note that although the County Standards only require min. 15 gallon size replacements, the planting plan recommends min. 24” box, and it is the 24” box that should be used for scoping purposes.

ADDITIONAL SCOPING REQUIREMENTS AND QUALIFICATIONS

Any additional trimming of protected trees or shrubs to remain, whether required by other environmental documents or project scoping documents or recommended by the DBE, shall be performed only under the direction of a certified arborist as defined in 17.02 of the Los Angeles Municipal code.

The DBE is responsible to provide related irrigation design, installation and maintenance for the landscape warranty established by the scoping documents.

For planting Alternative #1, the DBE is responsible to comply with the requirements of Attachment C, the City of Los Angeles Ordinance 186,873, which includes the requirements and procedures for protected tree protection, removal and replacement.

For planting Alternative #2, the DBE is responsible to comply with the requirements of Attachment D, the Los Angeles County Code 22.17, which includes the requirements and procedures for oak tree protection, removal and replacement.

The measures described herein are solely for the purposes of establishing the minimum anticipated protection and replacement requirements based on the scoping documents. This is not intended to limit the Design Build Entity (DBE) from proposing further protection or other site/landscape design alternatives that exceed the minimum requirements. Please utilize this information when developing the design-build scope of work.



Respectfully,
Onyx Architects, Inc.

A handwritten signature in blue ink, appearing to read "Stephen Kuchenski".

Stephen Kuchenski, AIA-Architect-CA License No. C17744

Principal

sk

Attachments:

- Attachment A – Tree Protection Report prepared by JTL Consultants, dated February 7, 2025
- Attachment B - Tree Inventory and Demolition Plan L-1,1 and Tree Planting Plan L-1.2 prepared by Troller Mayer Associates, dated 03-10-2025
- Attachment C, the City of Los Angeles Ordinance 186,873
- Attachment D, the Los Angeles County Code 22.17, Ord. 2019-0004

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JTL Consultants

Consulting Arborists and Biologists

952 Buena Vista Road • Duarte, CA 91010
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JTLconsultants.com

Protected Tree Report

Project Name and Address:

Olive View-UCLA Medical Center
Continuum Care Facility
14445 Olive View Drive
Sylmar, CA 91342

Sylmar Community Plan Area
City Council District 7

Prepared For:

Nicholas Ho, Project Manager
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803
(626) 592-1734

Prepared By:

Jeannine and Ted Lubeshkoff
Registered Consulting Arborists

February 7, 2025

TABLE OF CONTENTS

Summary	1
Introduction	1
Background	1
Assignment	2
Limits of Assignment	2
Purpose and Use of the Report.....	2
Observations	2
Site Description	2
Tree Descriptions	2
Tree Description Table.....	3
Tree Removals and Replacements	8
Discussion	8
Woodland Boundary Delineation	8
Mechanical Damage.....	8
Change in Grade	9
Trenching	9
Soil Compaction	9
Conclusion	9
Recommendations	10
Glossary	11
Bibliography	11
Appendix A – Project Plan.....	12
Appendix B – Tree Location and Protected Tree Zone Fencing Maps	13
Appendix C – Site Photos	15
Appendix D – Trees Photos	18
Appendix E – Assumptions and Limiting Conditions	37
Appendix F – Certificate of Performance.....	38
Appendix G – Qualifications	39

Summary

Los Angeles County Public Works plans to develop a Continuum of Care facility at the Olive View-UCLA Medical Center located at 14445 Olive View Drive in Sylmar, CA. The project includes the construction of a three-story, 55,000 square-foot building, outdoor activity areas, and parking lots. The Olive View-UCLA Medical Center campus is 230 acres and the project area is approximately 4 acres. Nicholas Ho is the Project Manager for Los Angeles County Public Works, Onyx Architects is contracted to provide architectural and engineering services, and JTL Consultants is subcontracted with Onyx Architects to provide a Protected Tree Report for the project. The City of Los Angeles Preservation of Protected Trees Ordinance 186,873 requires a Protected Tree Report be submitted outlining how the **Protected Trees**¹ will be protected.

JTL Consultants conducted a tree survey of the project site on January 16, 2025 and January 17, 2025 and inventoried 75 trees and shrubs, including 42 Protected Tree and Shrubs listed in the Preservation of Protected Trees Ordinance 186,873. There are no woodlands on the site comprised of two or more trees of the same species with a trunk diameter greater than 54 inches, whose sphere of influence overlaps.

A total of 19 trees: 11 coast live oaks (*Quercus agrifolia*), 6 toyons (*Heteromeles arbutifolia*), and 2 blue elderberries (*Sambucus mexicana*) are proposed to be removed for the construction of the project. The trees will be mitigated with the planting of 76 trees on-site: 44 coast live oaks, 24 toyons, and 8 blue elderberries. The remaining 23 Protected Trees and Shrubs will be protected during construction with the installation of chain-link tree protection fences.

Introduction

Background

Los Angeles County Public Works plans to build a three-story, 55,000 square-foot Continuum Care facility with outdoor activity areas and parking lots at the Olive View-UCLA Medical Center, 14445 Olive View Drive, Sylmar CA, 91342. The building will include Enriched Residential Services, a Psychiatric Health Facility, and a Mental Health Center (Appendix A - Project Plan). The project is located in the northwest side of the Olive View-UCLA Medical Center campus. The building and outdoor activity areas will be located north of Bucher Avenue and the parking lot will be located south of Bucher Avenue. The Medical Center was founded in 1920 as a sanatorium and became an acute care hospital in 1970. Onyx Architects asked JTL Consultants to write a Protected Tree Report for this project. JTL Consultants conducted a survey for the project of 75 trees and shrubs on January 16, 2025 and January 17, 2025. There are 42 Tree and Shrubs protected by the City of Los Angeles Preservation of Protected Trees Ordinance 186,873. This ordinance requires a Protected Tree Report be submitted describing how the Protected Trees will be protected during construction. Of the 42 Protected Trees and Shrubs, 18 are proposed to be removed for the project and will be mitigated with the planting of 72 Protected Trees and Shrubs of the same species. The remaining 24 Protected Trees and Shrubs will be protected during construction.

¹ Terms appearing in boldface type are defined in the Glossary

Assignment

JTL Consultants' assignment was to conduct a tree survey of the site and write a Protected Tree Report outlining how the Protected Trees will be protected during construction.

Limits of Assignment

This report is based solely the tree survey conducted on January 16, 2025 and January 17, 2025, a site meeting with Nicholas Ho on January 30, 2024 discussing proposed Protected Tree removals, and a review of the project plans provided by Nicholas Ho. The tree inspections were limited to ground level visual observations. Root crown inspections, aerial inspections, Tree Risk Assessments, and Tree Appraisals were not conducted. Non-protected shrub species, such as laurel sumac (*Malosma laurina*) and sugar bush (*Rhus ovata*), were not included in the survey.

Purpose and Use of the Report

The purpose of this report is to identify the Protected Trees and Shrubs on the project site and outline how the trees will be protected during the construction of the project. This report is intended to be used by Los Angeles County Public Works to implement the recommendations outlined in it. Upon submission, this report will become the property of Los Angeles County Public Works and its use will be at their discretion.

Observations

Site Description

The project site is located in the northwest side of the Olive View-UCLA Medical Center campus located at 14445 Olive View Drive in the Sylmar neighborhood of Los Angeles, CA, in the Sylmar Community Plan Area of the City of Los Angeles, in the County of Los Angeles. The Olive View-UCLA Medical Center campus is 230 acres and the project area is approximately 4 acres. The site is bounded by the Angeles National Forest to the north and east, Interstate 210 to the south, and Interstate 5 and State Route 14 to the west. On the project site, there are non-native non-protected trees, native Protected coast live oaks, native non-protected shrubs and native Protected toyon and elderberry shrubs. (Appendix B - Tree Location and Protected Tree Zone Fencing Maps, Appendix C – Site Photos, and Appendix D – Tree Photos)

Tree Descriptions

In the following table, the Tree ID numbers correspond to a tag attached to the trunk of each tree and referenced on the Tree Location and Protected Tree Zone Fencing Maps and in the Site Photo and Tree Photos. The trunk diameter (**DBH**) is shown in inches and the height and width are shown in feet. 'Protected' designates a Protected Species listed in Ordinance 186,873.

Tree Description Table

Tree ID	Species Common Name	DBH	Height	Width	Trunks	Condition	Protected	To be removed	Comments	Recommendations
401	<i>Quercus agrifolia</i> coast live oak	24	40	60	1	Good	Yes		dead branches branch tearout	
402	<i>Eucalyptus sideroxylon</i> red ironbark	26	50	40	2	Fair	No		codominant stems	
403	<i>Quercus agrifolia</i> coast live oak	18	20	15	3	Fair	Yes	✓	overcrowded	
404	<i>Heteromeles arbutifolia</i> toyon	20	15	15	5	Good	Yes	✓		
405	<i>Quercus agrifolia</i> coast live oak	15	15	20	2	Good	Yes	✓		
406	<i>Quercus agrifolia</i> coast live oak	21	20	20	5	Good	Yes	✓		
407	<i>Quercus agrifolia</i> coast live oak	36	35	50	3	Fair	Yes	✓	decay in trunk and branches	
408	<i>Quercus agrifolia</i> coast live oak	18	40	45	1	Poor	Yes	✓	tree in decline	
409	<i>Heteromeles arbutifolia</i> toyon	20	15	30	1	Good	Yes	✓	metal stake damaging branch	remove metal stake
410	<i>Quercus agrifolia</i> coast live oak	30	15	15	10	Good	Yes	✓		
411	<i>Eucalyptus polyanthemos</i> silver dollar gum	34	80	25	4	Poor	No		resprout and deadwood	
412	<i>Eucalyptus polyanthemos</i> silver dollar gum	34	80	50	1	Fair	No		woodpecker tracks on trunk and deadwood	
413	<i>Sambucus mexicana</i> blue elderberry	50	15	30	20	Fair	Yes		sparse foliage	
414	<i>Eucalyptus polyanthemos</i> silver dollar gum	18	60	25	1	Poor	No		dead branches	

Tree ID	Species Common Name	DBH	Height	Width	Trunks	Condition	Protected	To be removed	Comments	Recommendations
415	<i>Eucalyptus polyanthemos</i> silver dollar gum	18	80	20	2	Poor	No		resprout	
416	<i>Eucalyptus polyanthemos</i> silver dollar gum	20	90	25	3	Poor	No		resprout	
417	<i>Eucalyptus polyanthemos</i> silver dollar gum	28	60	45	3	Poor	No		dead branches	
418	<i>Eucalyptus polyanthemos</i> silver dollar gum	35	50	30	6	Poor	No		resprout	
419	<i>Eucalyptus polyanthemos</i> silver dollar gum	25	75	30	4	Poor	No		resprout	
420	<i>Eucalyptus polyanthemos</i> silver dollar gum	20	45	40	5	Fair	No		resprout	
421	<i>Eucalyptus polyanthemos</i> silver dollar gum	30	75	30	4	Fair	No		resprout	
422	<i>Eucalyptus polyanthemos</i> silver dollar gum	28	75	40	4	Fair	No		resprout	
423	<i>Quercus agrifolia</i> coast live oak	18	20	30	3	Good	Yes	✓		
424	<i>Eucalyptus polyanthemos</i> silver dollar gum	16	70	25	2	Fair	No		sparse foliage	
425	<i>Eucalyptus polyanthemos</i> silver dollar gum	25	70	25	3	Poor	No		resprout	
426	<i>Eucalyptus polyanthemos</i> silver dollar gum	30	75	25	3	Good	No			
427	<i>Heteromeles arbutifolia</i> toyon	30	20	30	15	Good	Yes	✓		
428	<i>Heteromeles arbutifolia</i> toyon	30	20	20	10	Good	Yes	✓		
429	<i>Quercus agrifolia</i> coast live oak	16	45	40	2	Good	Yes	✓	next to enclosed drainage	
430	<i>Sambucus mexicana</i> blue elderberry	40	40	45	1	Good	Yes	✓		

Tree ID	Species Common Name	DBH	Height	Width	Trunks	Condition	Protected	To be removed	Comments	Recommendations
431	<i>Sambucus mexicana</i> blue elderberry	20	20	20	3	Poor	Yes	✓	sparse foliage	
432	<i>Grevillea robusta</i> silk oak	31	90	35	1	Good	No			
433	<i>Afrocarpus falcatus</i> fern pine	29	70	50	1	Good	No			
434	<i>Heteromeles arbutifolia</i> toyon	50	40	40	10	Good	Yes	✓		
435	<i>Quercus agrifolia</i> coast live oak	8	15	25	1	Fair	Yes	✓	poor branch architecture	
436	<i>Ulmus parvifolia</i> Chinese elm	16	45	40	1	Poor	No		next to 435 and dormant when surveyed	
437	<i>Phoenix canariensis</i> Canary Island date palm	28	75	30	1	Good	No			
438	<i>Quercus agrifolia</i> coast live oak	6	25	20	1	Good	Yes			
439	<i>Acacia baileyana</i> bailey acacia	7	25	30	1	Good	No			
440	<i>Acacia baileyana</i> bailey acacia	4	20	15	1	Good	No			
441	<i>Acacia baileyana</i> bailey acacia	15	25	20	3	Good	No			
442	<i>Quercus agrifolia</i> coast live oak	18	20	25	3	Good	Yes			
443	<i>Phoenix canariensis</i> Canary Island date	28	50	25	1	Good	No			
444	<i>Acacia baileyana</i> bailey acacia	4	20	20	1	Good	No			
445	<i>Acacia baileyana</i> bailey acacia	4	15	15	1	Good	No			

Tree ID	Species Common Name	DBH	Height	Width	Trunks	Condition	Protected	To be removed	Comments	Recommendations
446	<i>Phoenix canariensis</i> Canary Island date palm	26	40	25	1	Good	No			
447	<i>Heteromeles arbutifolia</i> toyon	6	10	15	1	Good	Yes	✓		
448	<i>Quercus agrifolia</i> coast live oak	10	30	40	1	Good	Yes			
449	<i>Quercus agrifolia</i> coast live oak	6	10	15	1	Fair	Yes	✓	resprout	
450	<i>Eucalyptus polyanthemos</i> Silver dollar gum	24	50	40	1	Fair	No		decay in trunk and branches	
451	<i>Eucalyptus polyanthemos</i> Silver dollar gum	40	40	35	5	Good	No			
452	<i>Eucalyptus polyanthemos</i> Silver dollar gum	58	50	50	4	Fair	No		decay in trunk and branches	
453	<i>Quercus agrifolia</i> coast live oak	24	10	15	2	Poor	Yes		decay in trunk and branches	
454	<i>Eucalyptus polyanthemos</i> Silver dollar gum	16	35	40	2	Good	No			
455	<i>Eucalyptus polyanthemos</i> Silver dollar gum	20	45	40	3	Good	No			
456	<i>Eucalyptus polyanthemos</i> Silver dollar gum	10	45	30	1	Good	No			
457	<i>Eucalyptus polyanthemos</i> Silver dollar gum	23	50	40	2	Good	No			
458	<i>Quercus agrifolia</i> coast live oak	22	40	50	1	Good	Yes			
459	<i>Quercus agrifolia</i> coast live oak	71	45	60	4	Good	Yes		yellow pole against trunk asphalt within dripline	remove yellow pole and asphalt
460	<i>Heteromeles arbutifolia</i> toyon	20	20	20	3	Good	Yes			

Tree ID	Species Common Name	DBH	Height	Width	Trunks	Condition	Protected	To be removed	Comments	Recommendations
461	<i>Quercus agrifolia</i> coast live oak	6	15	15	1	Good	Yes			
462	<i>Quercus agrifolia</i> coast live oak	80	50	75	4	Good	Yes		pipe near trunk	remove pipe
463	<i>Quercus agrifolia</i> coast live oak	30	45	45	2	Good	Yes			
464	<i>Quercus agrifolia</i> coast live oak	35	45	40	3	Good	Yes			
465	<i>Quercus agrifolia</i> coast live oak	16	40	35	1	Good	Yes			
466	<i>Quercus agrifolia</i> coast live oak	12	35	20	1	Good	Yes			
467	<i>Heteromeles arbutifolia</i> toyon	4	10	5	1	Good	Yes			
468	<i>Quercus agrifolia</i> coast live oak	9	25	20	1	Good	Yes			
469	<i>Quercus agrifolia</i> coast live oak	18	25	20	3	Good	Yes			
470	<i>Quercus agrifolia</i> coast live oak	30	50	70	1	Good	Yes			
471	<i>Quercus agrifolia</i> coast live oak	24	50	50	1	Good	Yes			
472	<i>Quercus agrifolia</i> coast live oak	30	45	45	2	Good	Yes			
473	<i>Quercus agrifolia</i> coast live oak	21	50	50	1	Good	Yes			
474	<i>Heteromeles arbutifolia</i> toyon	20	15	20	3	Good	Yes			
475	<i>Quercus agrifolia</i> coast live oak	23	60	40	1	Good	Yes		asphalt within dripline	remove asphalt

Tree Removals and Replacements

Species Common Name	Number of Trees to be Removed	Number of Trees to be Replaced
<i>Quercus agrifolia</i> coast live oak 403, 405, 406, 407, 408, 410, 423, 429, 435, 438, 449	11	44
<i>Heteromeles arbutifolia</i> toyon 404, 409, 427, 428, 434, 447	6	24
<i>Sambucus mexicana</i> blue elderberry 430, 431	2	8
Total	19	76

Discussion

Woodland Boundary Delineation

There are no woodlands on the site, comprised of two or more trees of the same species with a trunk diameter greater than 54 inches, whose sphere of influence overlaps. Tree 459 and Tree 462, both coast live oaks, have trunk diameters greater than 54 inches, but their spheres of influence don't overlap. (Appendix B, Map 2 - Planned Parking Lot Area)

The City of Los Angeles Planning Department Tree Report Template states, "If the project site contains any oaks, or Southern California black walnuts, or other qualified trees, delineate the boundaries and areas of any qualified woodlands or groves by identifying tree stands comprising two or more trees (greater than a 54-inch diameter at standard height) of the same species, whose sphere of influence have any overlap".

Mechanical Damage

Mechanical damage could occur to the 24 Protected Trees and Shrubs that are not proposed to be removed for the construction of the project.

Wounds to tree branches and trunks caused by mechanical damage may reduce tree stability by decreasing the wood strength, the internal movement of water and nutrients, and the ability to defend against decay. Protecting the trees with fencing will help prevent damage from construction. (Matheny, et al, 1998 and Fite, Kelby, and Smiley, 2008)

Change in Grade

The grade will not be lowered or raised within the **dripline** of the 24 Protected Trees and Shrubs not to be removed for the construction of the project.

The lowering or raising of the grade within the dripline can damage or kill a tree. The normal exchange of moisture and gases within the dripline is disrupted with the change in grade. The original grade should be maintained as far out from the trunk as possible. The change in grade can have immediate or long-term adverse effects on the tree. (Matheny and Clark, 1998)

Trenching

Trenching will not occur within the dripline of the 24 Protected Trees and Shrubs not to be removed for the construction of the project.

Trenching within the dripline can damage the root system of a tree and lead to tree decline or death. Ninety percent of the fine roots that absorb water and minerals are found in the upper few inches of soil. Roots require space, air, and water, and grow best where these requirements are met, which is usually at or near the soil surface. When roots are cut due to trenching, the cut should be clean, leaving no torn edges. Tunneling and bridging should be used to preserve roots wherever possible, underground lines should occupy common trenches. (Matheny, et al, 1998)

Soil Compaction

Soil compaction could occur within the dripline of the the 24 Protected Trees and Shrubs not to be removed for the construction of the project.

Soil compaction occurs when the pore space between soil particles is greatly reduced. This causes the reduction of oxygen available to the roots and can lead to decline in trees. Use of equipment, grading, digging, and heavily used walking paths can cause soil compaction in a construction area. Use of protective fencing, mulching within the protective fencing, and limiting the amount of access routes will minimize soil compaction. (Fite, et al, 2008)

Conclusion

Los Angeles County Public Works plans to develop a Continuum of Care facility at the Olive View-UCLA Medical Center located at 14445 Olive View Drive in Sylmar, CA. The project includes the construction of a three-story, 55,000 square-foot building, outdoor activity areas, and parking lots. Onyx Architects contacted JTL Consultants to write a Protected Tree Report for this project. JTL Consultants conducted a tree survey of 75 trees and shrubs, including 42 Protected Tree and Shrubs listed in the Preservation of Protected Trees Ordinance 186,873. A total of 19 trees are proposed to be removed: 11 coast live oaks, 6 toyons, and 2 blue elderberries. The trees will be mitigated with the planting of 76 trees on-site: 44 coast live oaks, 24 toyons, and 8 blue elderberries. The remaining 23 Protected Trees and Shrubs will be protected during construction. The recommendations will be followed to minimize the impacts of the construction on the trees.

Recommendations

1. Install tree protection fencing around the Protected Trees, as shown on the Tree Location and Protected Tree Zone Fencing Maps
 - a. Chain-link fencing will be at least five-feet tall. This fencing will remain in place through the duration of the construction. Orange flexible fencing will not be used.
 - b. The fencing will not be moved at any time for construction work unless the work is supervised by the project arborist.
 - c. Within the fenced enclosures, no digging, trenching, soil compaction, or other soil disturbance will be allowed, and the fenced enclosures will be kept clear of building materials, waste, and excess soil.
2. The project arborist will be on-site when the tree protection fencing is installed and if any excavation, drilling, demolition, or backfilling takes place within the fenced enclosures.
3. The project arborist will make monthly site visits to ensure the tree protection fencing is in place and to monitor the condition of the trees.
4. Locate the turnaround to be outside of the **Tree Protection Zone** of Tree 401.
5. Remove existing pavement from inside the Tree Protection Zone of Tree 401.
6. Locate the northwest parking lot access to the area between Trees 442 and 448, as shown on the Project Plan, as indicated by the black arrow.
7. Remove the yellow pole and asphalt from inside the dripline of Tree 459.
8. Remove the pipe near trunk of Tree 462.
9. Remove the asphalt from inside the dripline of Tree 475.
10. Prevent any water from irrigation for the newly planted trees along the south side of the proposed parking lot from encroaching into the dripline of the existing coast live oaks. This measure is to prevent summer watering of the coast live oaks which could contribute to root rot.

Glossary

Condition: one of four possible ratings:

Good - no apparent **defects** or structural problems

Fair - minor defects or structural problems

Poor - major defects or structural problems

Dead - extreme defects or structural problems

DBH: diameter of a tree trunk measured at 4 ½ feet above ground.

Defect: an internal or external point of weakness which can reduce the stability of the tree and include cracks, splits, cankers, galls, girdling, codominant limbs, and wounds.

Dripline: imaginary line defined by the branch spread of a single plant or group of plants, projected onto the ground. Roots are usually found within the dripline but can extend beyond the edge of the dripline.

Protected Tree:

The City of Los Angeles Preservation of Protected Trees, Ordinance 186,873, Section 46.01 defines a Protected Tree or Shrub as any tree or shrub within the City of Los Angeles that one of the following southern California native species, which measure four inches or more in cumulative diameter, four and one-half feet above ground:

- Any Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*)
- Southern California Black Walnut (*Juglans californica var. californica*)
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- Mexican Elderberry (*Sambucus mexicana*)
- Toyon (*Heteromeles arbutifolia*)

Tree Protection Zone: An area that extends 15 feet from the trunk and 5 feet outside the dripline.

Bibliography

Fite, Kelby, and Smiley, Thomas E., Best Management Practices, *Managing Trees During Construction*, International Society of Arboriculture, Champaign, IL 2008.

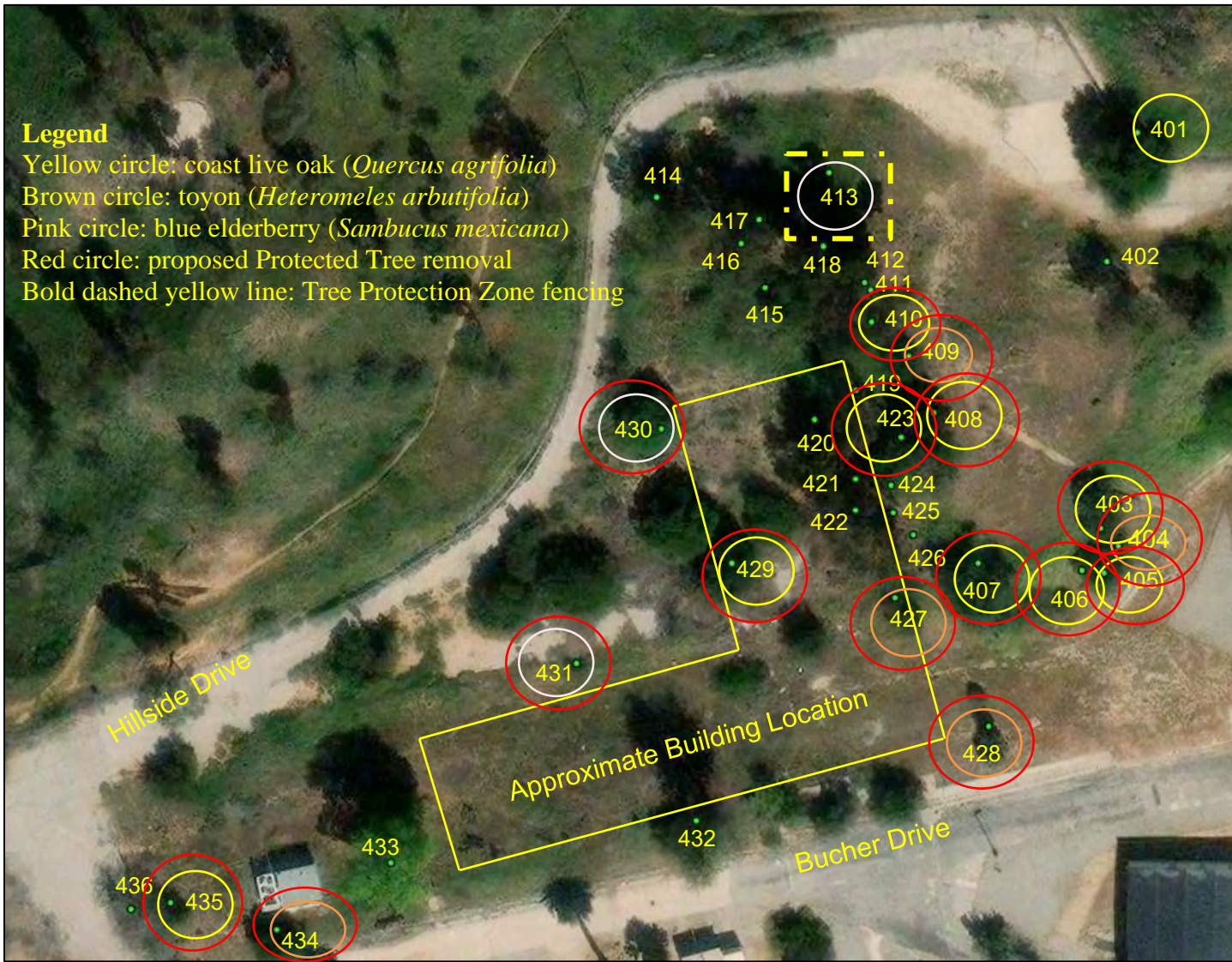
Matheny, Nelda and Clark, James R., *Trees and Development: A Technical Guide to Preservation of Trees during Land Development*, International Society of Arboriculture, Champaign, IL 1998.

Appendix A – Project Plan

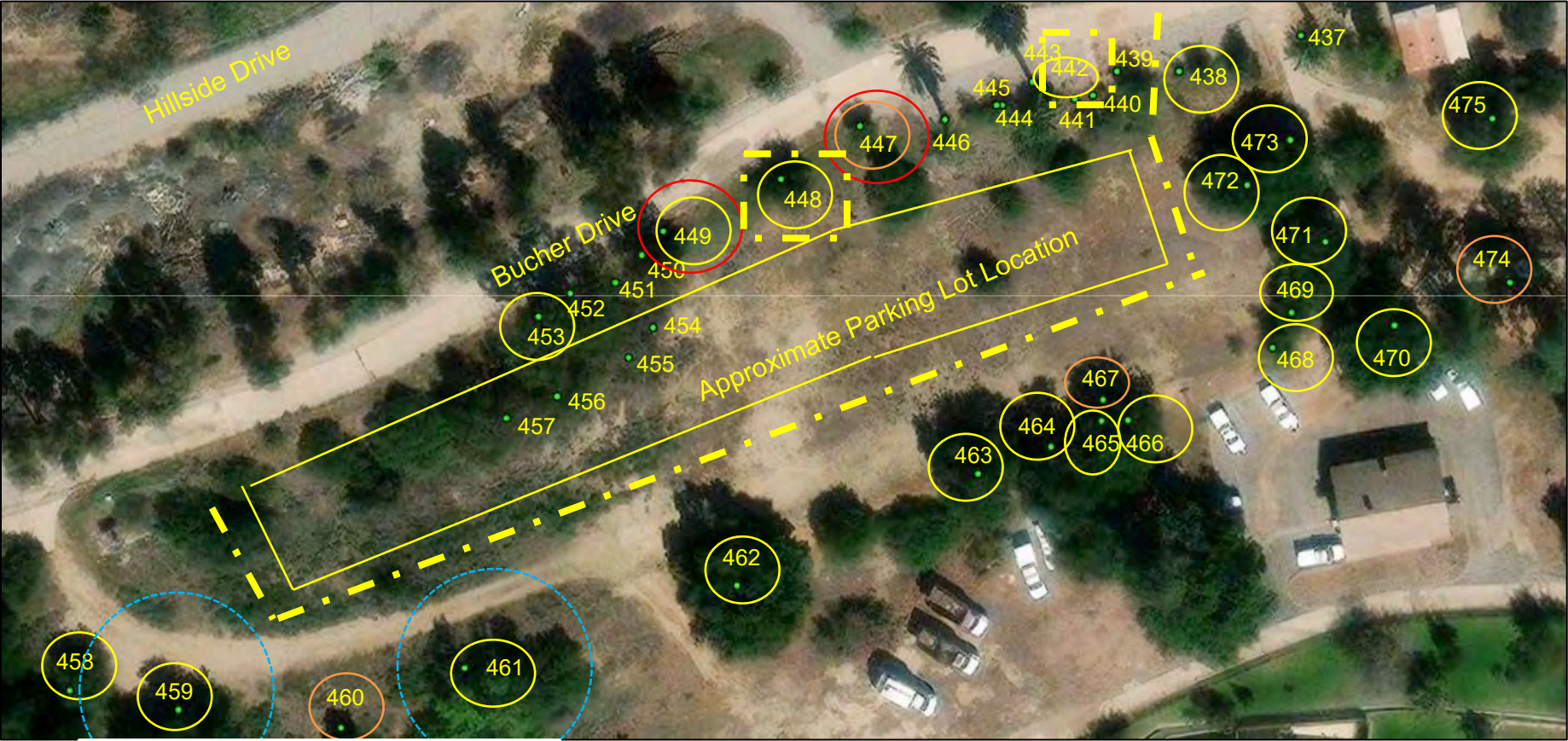


Appendix B – Tree Location and Protected Tree Zone Fencing Maps

Map 1 – Planned Building Area



Map 2 – Planned Parking Lot Area



Legend

- Yellow circle: coast live oak (*Quercus agrifolia*)
- Brown circle: toyon (*Heteromeles arbutifolia*)
- Red circle: proposed Protected Tree removal
- Bold dashed yellow line: Tree Protection Zone fencing
- Thin dashed blue line: Sphere of Influence



Appendix C – Site Photos



Photo A, facing east, showing Trees 403-406 east of the planned Outdoor Activity area.
Photo B, facing south, showing Trees 429 and 431 in the planned building site area.





Photo C, facing north, showing Trees 438 and 442 in the planned northeast parking lot access area.

Photo D, facing west, showing Trees 458 and 459 southwest of the planned parking lot.





Photo E, facing west, showing Trees 463-467 south of the planned parking lot.
Photo F, facing west, showing Trees 469, 471, and 472 west of the planned parking lot.



Appendix D – Tree Photos



Tree 401, facing west



Tree 402, facing southwest



Tree 403, facing east



Tree 404, facing northwest



Tree 405, facing northwest



Tree 406, facing east



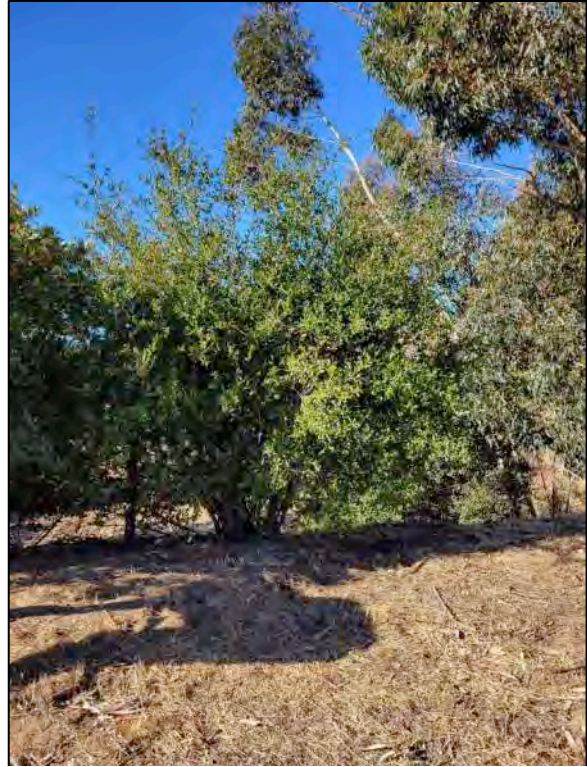
Tree 407, facing southwest



Tree 408, facing southwest



Tree 409, facing west



Tree 410, facing west



Tree 411, facing west



Tree 412, facing west



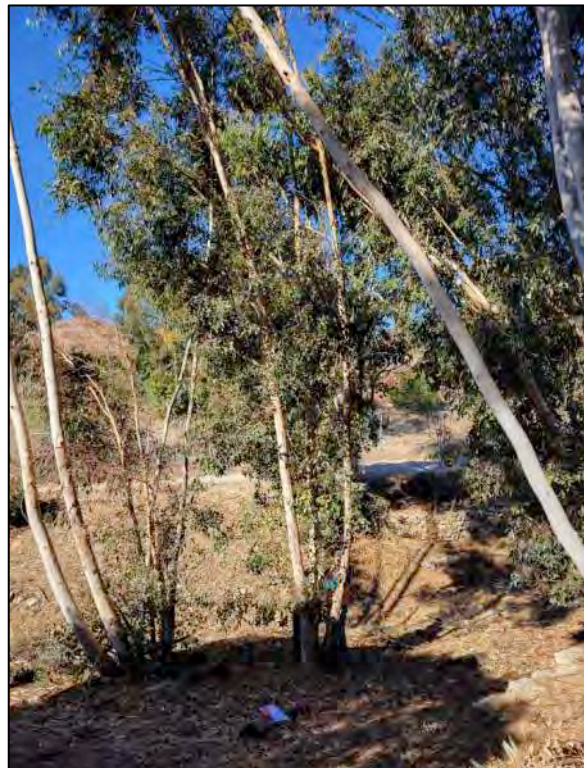
Tree 413, facing west



Tree 414, facing south



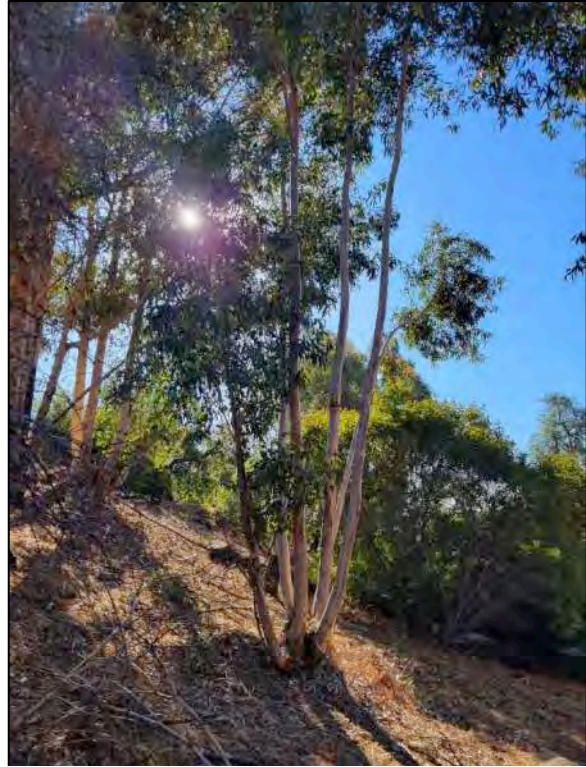
Tree 415, facing west



Tree 416, facing west



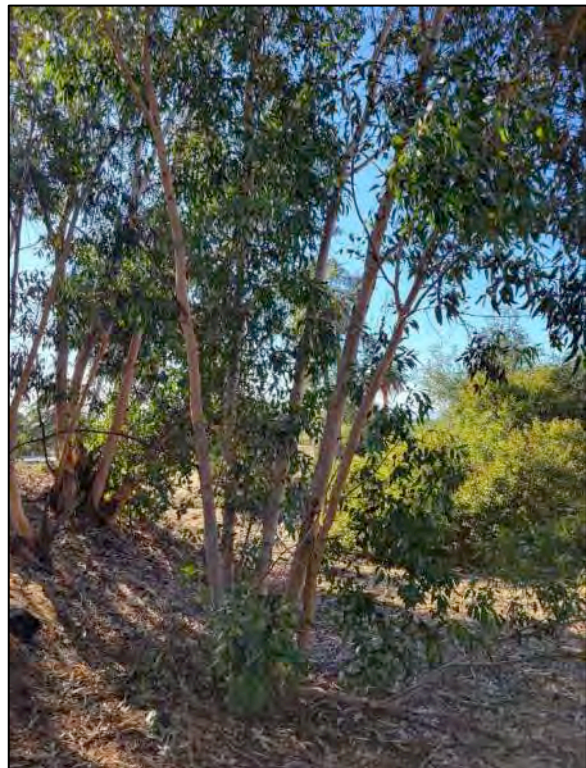
Tree 417, facing northwest



Tree 418, facing southeast



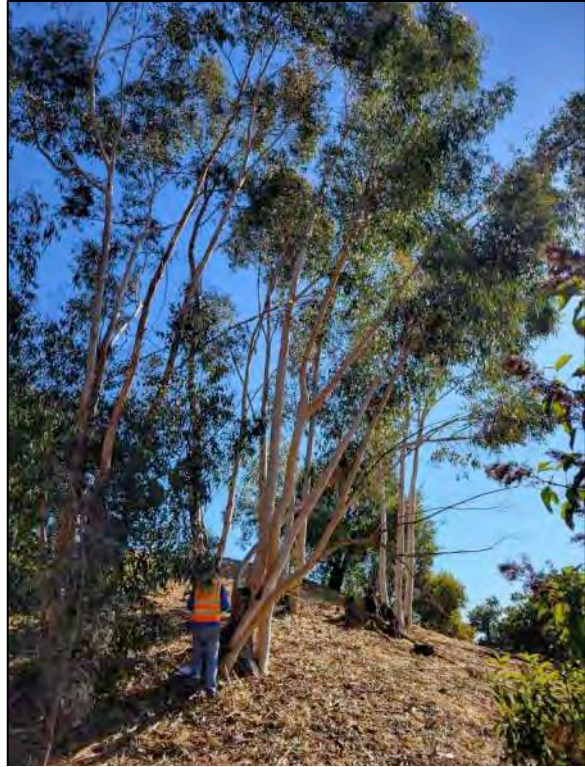
Tree 419, facing east



Tree 420, facing south



Tree 421, facing east



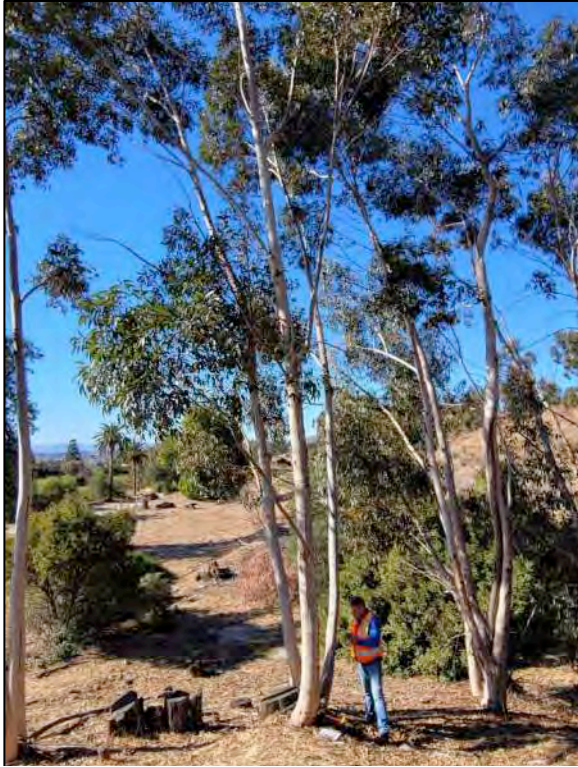
Tree 422, facing east



Tree 423, facing east



Tree 424, facing west



Tree 425, facing west



Tree 426, facing west



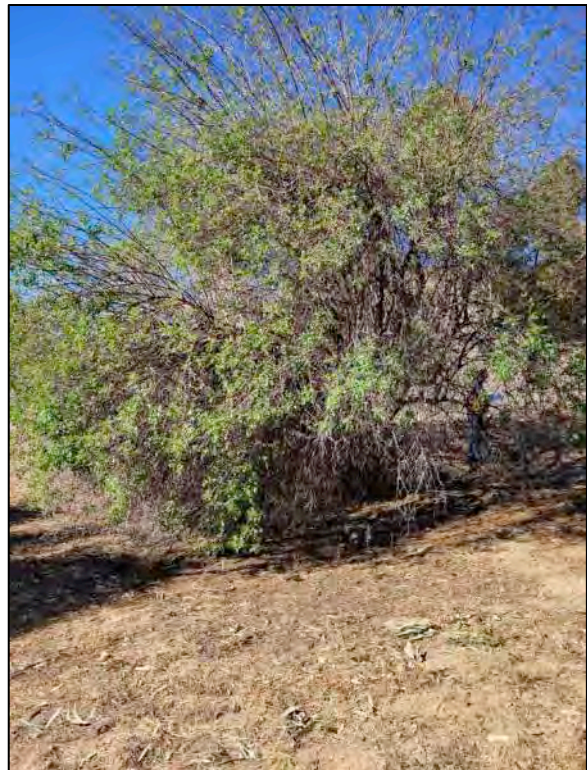
Tree 427, facing northeast



Tree 428, facing west



Tree 429, facing south



Tree 430, facing west



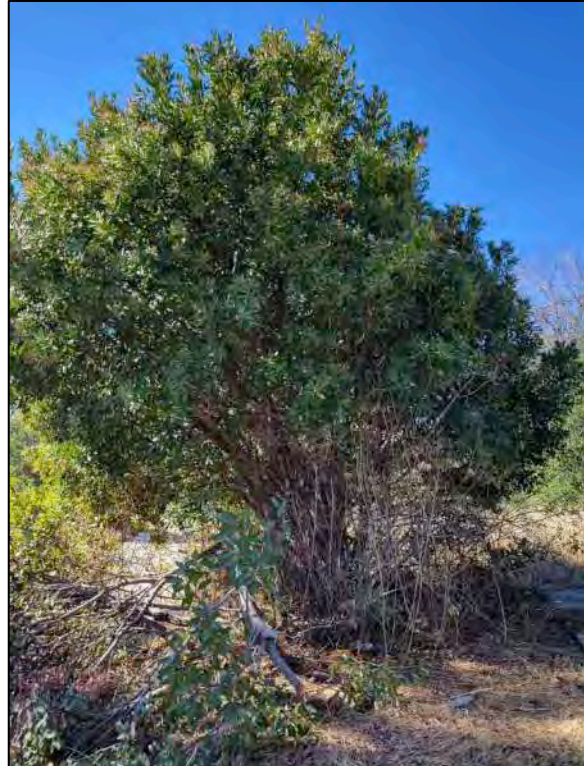
Tree 431, facing north



Tree 432, facing southwest



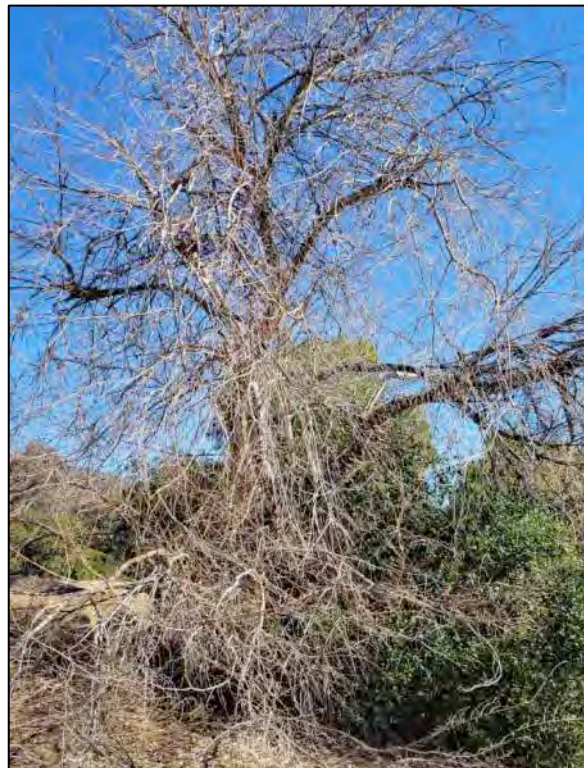
Tree 433, facing southwest



Tree 434, facing west



Tree 435, facing west



Tree 436, facing east



Tree 437, facing east



Tree 438, facing south



Tree 439, facing south



Tree 440, facing south



Tree 441, facing south



Tree 442, facing south



Tree 443, facing south



Tree 444, facing south



Tree 445, facing south



Tree 446, facing south



Tree 447, facing south



Tree 448, facing south



Tree 449, facing south



Tree 450, facing south



Tree 451, facing south



Tree 452, facing south



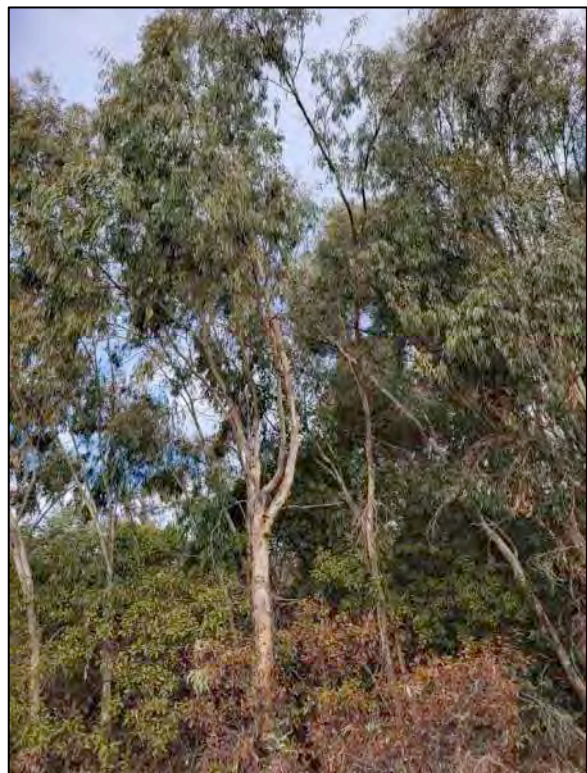
Tree 453, facing south



Tree 454, facing northwest



Tree 455, facing northwest



Tree 456, facing northwest



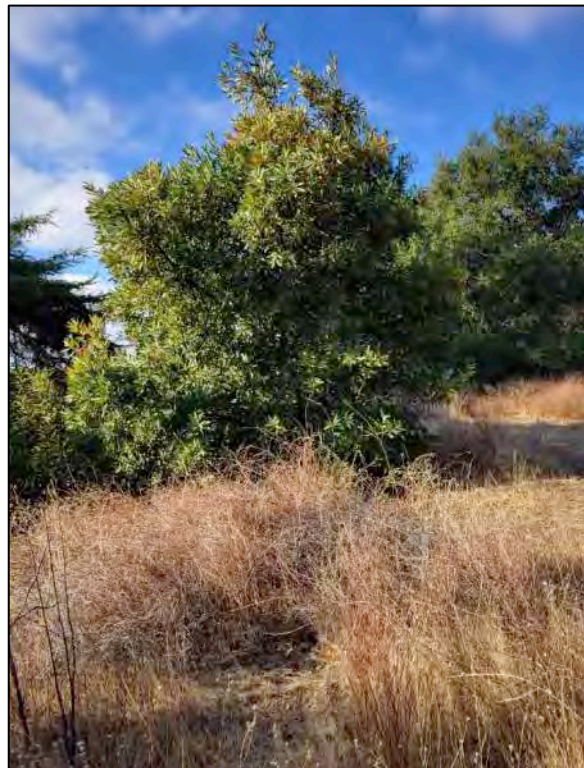
Tree 457, facing northwest



Tree 458, facing northwest



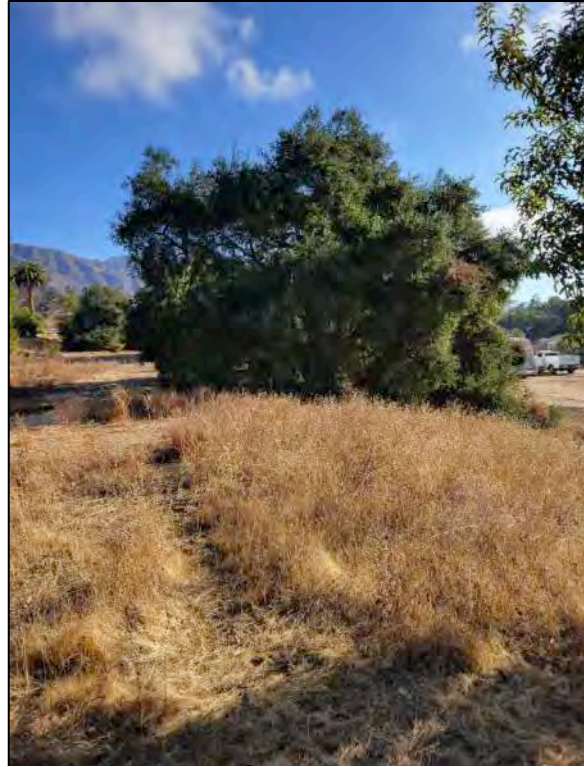
Tree 459, facing southeast



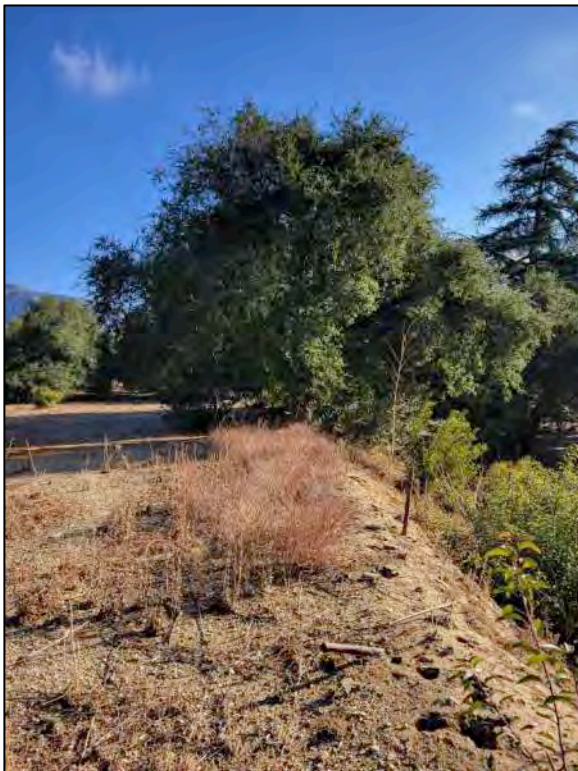
Tree 460, facing southwest



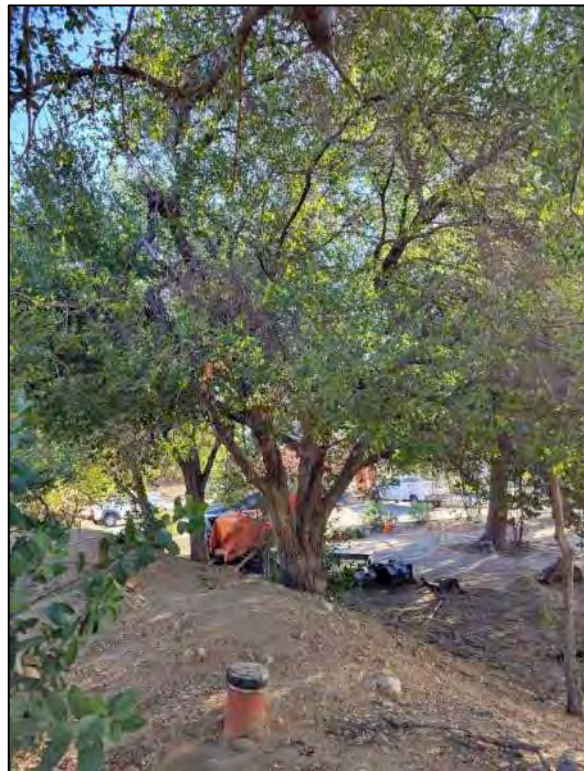
Tree 461, facing southwest



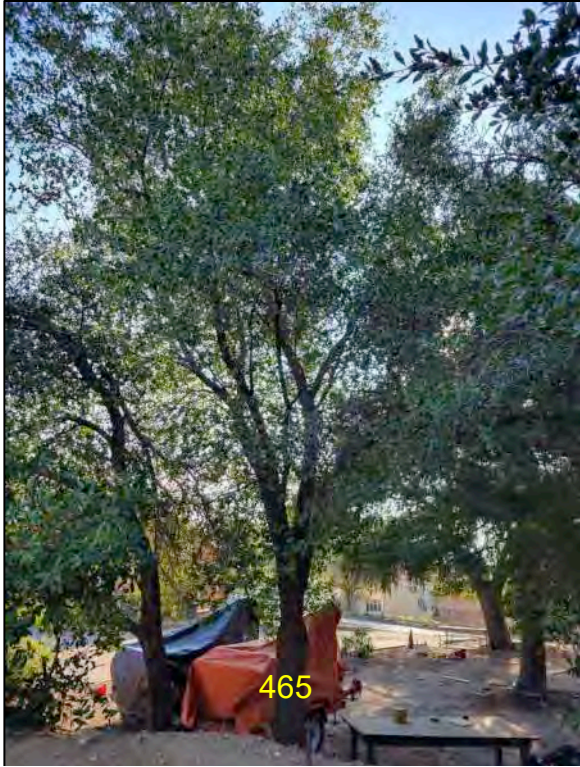
Tree 462, facing northeast



Tree 463, facing northeast



Tree 464, facing northwest



Tree 465, facing southeast



Tree 466, facing south



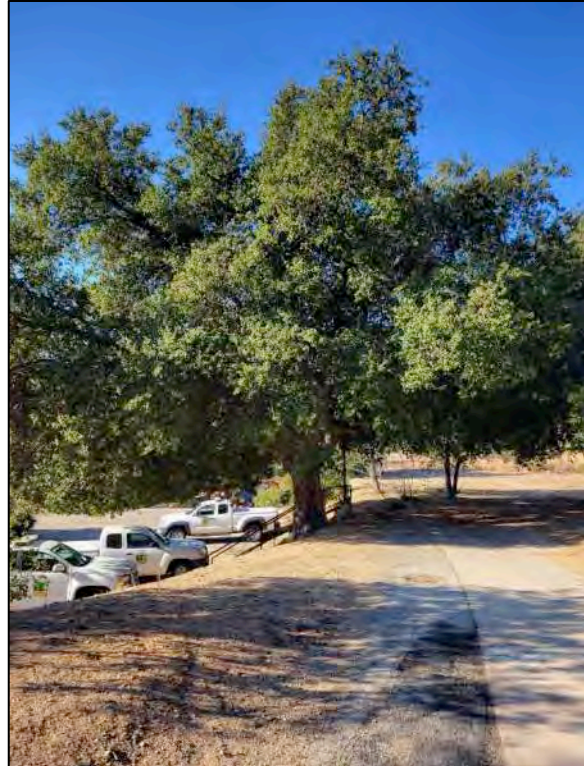
Tree 467, facing southeast



Tree 468, facing east



Tree 469, facing east



Tree 470, facing southeast



Tree 471, facing west



Tree 472, facing northeast



Tree 473, facing southwest



Tree 474, facing north



Tree 475, facing north

Appendix E - Assumptions and Limiting Conditions

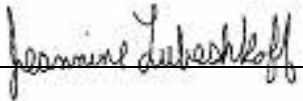
1. Any legal description provided to the consultant/appraiser is assumed to be correct. Any titles and ownerships to any property are assumed to be good and marketable.
2. Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible for the accuracy of information provided by others.
3. The consultant/appraiser shall not be required to give testimony or attend court by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule and contract of engagement.
4. Loss or alteration of any part of this report invalidates the entire report.
5. Possession of this report or a copy thereof does not imply right of publication or use for any purpose by any other than the person to whom it is addressed, without the prior expressed written consent of the consultant/appraiser.
6. This report and values expressed herein represent the opinion of the consultant/appraiser, and the consultant's/appraiser's fee is in no way contingent upon the reporting of a specified value, a stipulated result, the occurrence of a subsequent event, nor upon any finding to be reported.
7. Sketches, diagrams, graphs, and photographs in this report, being intended as visual aids, are not necessarily to scale and should not be construed as engineering or architectural reports or surveys.
8. The tree locations in this report are not represented to be of survey quality but are sufficient to allow locating the tree in the field.
9. Unless expressed otherwise: 1) information contained in this report covers only those items that were examined and reflects the condition of those items at the time of inspection; and 2) the inspection is limited to visual examination of accessible items without dissection, excavation, probing, or coring. There is no warranty or guarantee, expressed or implied, that problems or deficiencies of the trees or property in question may not arise in the future.
10. Unless specifically stated, Tree Risk Assessments were not conducted on the trees described in this report and JTL Consultants is not responsible for the consequences of any risk associated with the trees, either inferred or implied.

Appendix F - Certificate of Performance

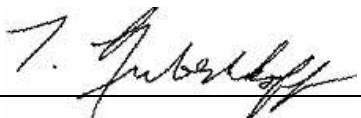
We, Jeannine and Ted Lubeshkoff of JTL Consultants, certify:

- ✓ That we have personally inspected the tree(s) referred to in the report and have stated our findings accurately. The extent of the evaluation is stated in the attached report;
- ✓ That we have no current or prospective interest in the vegetation or the property that is the subject of this report and have no personal interest or bias with respect to the parties involved;
- ✓ That the analysis, opinions and conclusions stated herein are our own and are based on current scientific procedures and facts;
- ✓ That our analysis, opinions and conclusions were developed, and this report has been prepared according to commonly accepted arboriculture practices;
- ✓ That no one provided significant professional assistance to us, except as indicated within the report;
- ✓ That our compensation is not contingent upon the reporting of a predetermined conclusion that favors the cause of the client or any other party nor upon the results if the assignment, the attainment of stipulated results, or the occurrence of any subsequent events.

I further certify that I, Jeannine Lubeshkoff, am Registered Consulting Arborist #500 with the American Society of Consulting Arborists, and Certified Arborist WE-8445A with the International Society of Arboriculture. I have been involved in the practice of arboriculture and the care and study of trees for over 20 years.

Signed  Date: 2/7/25

I further certify that I, Ted Lubeshkoff, am Registered Consulting Arborist #513 with the American Society of Consulting Arborists, and Certified Arborist WE-8446A with the International Society of Arboriculture. I have been involved in the practice of arboriculture and the care and study of trees for over 25 years.

Signed  Date: 2/7/25

Appendix G – Qualifications

The American Society of Consulting Arborists

in recognition of fulfillment of the requirements for

Registered Consulting Arborist® status

confers upon

Jeannine Lubeshkoff, RCA #500

Registered Membership



A handwritten signature in black ink, appearing to read "Alan H. Jones", written over a horizontal line.

Alan H. Jones, RCA #364
President

A handwritten signature in black ink, appearing to read "Beth W. Palys", written over a horizontal line.

Beth W. Palys, CAE
Executive Director

*The American Society
of
Consulting Arborists*

in recognition of fulfillment of the requirements for

Registered Consulting Arborist® status

confers upon

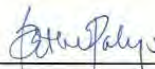
Ted Lubeshkoff, RCA #513

Registered Membership

12/19/2011



Dr. James R. Clark, RCA #357
President



Beth W. Palys, FASAE, CAE
Executive Director

NOTE:
FOR TREE ID# AND TREE SPECIES REFER TO THE LATEST TREE DESCRIPTION TABLE IN THE ARBORIST PROTECTED TREE REPORT

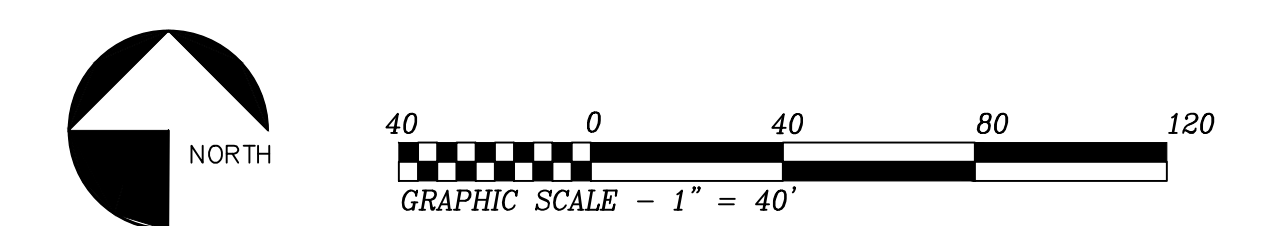


EXISTING TREE LEGEND

TREES TO BE REMOVED			
SYMBOL	TYPE	TREE SPECIES	NOTE
	PROTECTED TREE / SHRUB	REFER TO THE LATEST TREE DESCRIPTION TABLE IN THE ARBORIST TREE REPORT	19 PROTECTED TREES TO BE REMOVED
NOTES: 1. PROTECTED TREES / SHRUBS SHALL BE MITIGATED AT A 1:4 REPLACEMENT VALUE @ 24" BOX SIZE OR LARGER			
TREES TO REMAIN			
	EXISTING TREES TO REMAIN & PROTECT IN PLACE. REFER TO THE LATEST TREE DESCRIPTION TABLE IN THE ARBORIST TREE REPORT		

Demolition / Tree Protection Notes

- Before the start of demolition, the Contractor shall contact the Owner's Representative and a pre-construction meeting shall be scheduled. During this meeting, all site conditions including the locations of existing plants and Construction Documents shall be reviewed. Failure to call for said meeting implies acceptance by the Contractor of trees to be preserved in their existing condition as well as any liability for removing trees and other plant materials that are designated "Protect in Place".
- Before the demolition and removal of ANY landscape material refer to the Tree Protection Specifications (01532).
- Existing Utilities Verification: Prior to construction, Contractor shall confirm the locations of all existing utilities (above and below ground). Contractor to notify "Underground Service Alert" (800) 422-4133 to identify all underground utilities.
- Contractor shall protect all trees and tree roots that are designated "Protect in Place". Contractor shall notify owner / owner's representative of tree roots obstructing new construction.
- Existing Trees that are to be removed shall include roots, top.
- General Responsibility: The Contractor shall be directly responsible for protection, health and welfare of existing trees within the Contract Limits, which are noted to remain. This responsibility shall continue throughout the full construction period until the entire Project is completed and accepted by the Owner's Representative and through completion of the guarantee period.
- Wherever possible leave water source for watering trees and keep ground around all trees sufficiently moist until the end of the project. Create watering basins within the root zone of all trees to remain. Contractor to follow Tree Protection (01532 section 1.08) and Landscape Specifications (02900).
- All landscape debris removed shall be mulched/shredded and the material should be recycled/disposed of off site. Do not use debris from removed landscape debris as the final cover mulch material for new planting areas.
- The Contractor shall properly dispose of unsuitable soil as determined by owner's representative. All soil to be removed shall be disposed of off site per City of Long Beach Recycling Standards.
- The existing finish grade of the landscape planting area has compacted and subsided over the years. The new finished grade shall be brought up to finish surface of the curbs and sidewalks as per the plan details and specifications. The contractor shall import new topsoil as necessary to accomplish this task. Topsoil shall be tested as per the landscape specifications.
- Landscape Planting, Irrigation and Paving damaged by contractor shall be repaired and approved by the Owner's Representative before 100% completion of construction.
- Contractor shall not perform any work on utility lines, boxes etc. Any required repairs to utilities, caused by contractor, will be performed by the utility companies on contractor expense.



NOTE:
FOR TREE ID# AND TREE SPECIES REFER TO THE LATEST TREE DESCRIPTION TABLE IN THE ARBORIST PROTECTED TREE REPORT

ALTERNATIVE #1 (CITY OF LOS ANGELES STANDARD)

Tree Removals and Replacements		
Species Common Name	Number of Trees to be Removed	Number of Trees to be Replaced
<i>Quercus agrifolia</i> coast live oak 403, 405, 406, 407, 408, 410, 423, 429, 435, 438, 449	11	44
<i>Heteromeles arbutifolia</i> toyon 404, 409, 427, 428, 434, 447	6	24
<i>Sambucus mexicana</i> blue elderberry 430, 431	2	8
Total	19	76

ALTERNATIVE #2 (COUNTY OF LOS ANGELES STANDARD)

Tree Removals and Replacements		
Species Common Name	Number of Trees to be Removed	Number of Trees to be Replaced
<i>Quercus agrifolia</i> coast live oak 403, 405, 406, 407, 408, 410, 423, 429, 435, 438, 449	11	22
<i>Heteromeles arbutifolia</i> toyon 404, 409, 427, 428, 434, 447	6	0
<i>Sambucus mexicana</i> blue elderberry 430, 431	2	0
Total	19	22

PLANT LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS FACTOR
	QUERCUS AGRIFOLIA	COAST LIVE OAK	24" BOX	LOW
	HETEROMELES ARBUTIFOLIA	TOYON	24" BOX	LOW
	SAMBUCUS MEXICANA	BLUE ELDERBERRY	24" BOX	LOW



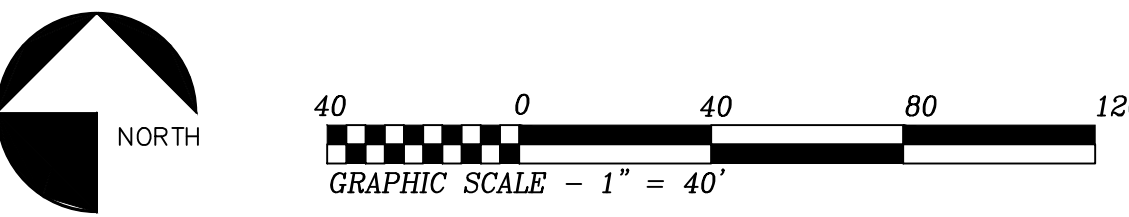
PLANTING NOTES:

- Before the demolition or start of construction, the Contractor shall contact the Landscape Architect, Civil Engineer and Client Representative to schedule a pre-construction meeting. During this meeting, all site conditions and Construction Documents shall be reviewed. All existing trees shall be preserved. Failure to call for said meeting implies acceptance by the Contractor of trees to be preserved in their existing condition as well as any liability for removing trees that are designated "Protect in Place".
 - Landscape Contractor shall procure and reserve plant material at start of contract to ensure availability and quality.
 - Plants are shown diagrammatically on plan therefore plant spacing in Planting Notes takes precedence to plants shown on the plan. Contractor is to calculate quantity of plants called for and install all that are shown on plan at the spacing in the legend.
 - Nursery images of all trees, shrubs and groundcover shall be submitted as part of the Landscape Submittal as required by the Landscape Specifications 02900. Images shall be submitted to the Landscape Architect for approval prior to planting see specs 2900. Images shall include height of plant and width. Submittal must be submitted (3) three weeks prior to any landscape or irrigation work commences.
 - All Landscape Planting, Irrigation and Paving damaged by contractor shall be repaired and approved by Owner's Representative before 100% completion of construction at no additional cost to the owner.
 - Finish grade shall be 2" below all walks/curbs for areas to receive shrub and/or groundcover and mulch.
 - In order to achieve a smooth, even finish grade, additional soil may need to be added to the planting areas. Refer to the Landscape Specifications for additional information on imported soil.
 - Finish grade shall be 1" below all walks/curbs for areas to receive turf.
 - All trenches, holes, and divots from construction work in areas of existing turf/shrub areas to remain shall be patch/repaired and re-seeded/re-mulched. Infill soil shall be installed to all trenches, holes and divots as to re-establish uniform finish grade. Soil shall be compacted to 85% prior to re-seeding/re-mulching. See Landscape Specifications 02900 for further info.
 - Finish grade shall slope 2% away from structures and towards swales (when applicable)
 - Spread 3" layer of "Walk On-Bark" as supplied by Wickes Forest Industries, Kellogg Supply, Sequoia Forest Products, or equal approved by the Owner's Representative. Mulch shall be installed under and in between all new trees, shrubs, ground cover so as to leave soil completely covered with mulch. Pull Mulch away from base of trees and plants. Mulch shall be per the Landscape Specifications. A physical sample of the mulch shall be submitted to the Landscape Architect/Architect for approval prior to installation. See Landscape Specification 02900 for mulch size.
 - Water Percolation -- Contractor to dig a test planting pit, 3'-0" square and 3'-0" deep; fill pit with water up to 2'-0" from bottom and mark location and check level in 24 hours. If standing water is present, Contractor to contact College's Representative and Landscape Architect and it will be determined if a sump pump must be implemented.
 - Conduct two (2) soil tests per the soil test location marked on the Planting Plan with the symbol: The first test on site shall be conducted after rough grading is complete and the second test before planting commences, but after irrigation installment and soil amendments have been applied. These tests are to determine recommended amounts of fertilizer and harmful substances, if any. See specifications for soil testing information of existing and imported soil.
 - During soil preparation amend with Gypsum (Agricultural Calcium Sulfate Ca SO4) per amount recommended by the soil test results. See specifications for further information.
 - All new and existing planting areas shall be free of construction debris, rocks, form boards, weeds etc. See Landscape Specifications 02900.
 - All new trees to be installed adjacent to any hardscape areas (street curbs, driveways, and sidewalks) shall include linear root barriers. The root barrier should extend 5' on either side of the tree trunk for a total length of 10'. Install barriers from Deep Root, (800) 766-8835. See Detail for typical installation.
- Specification follows:
- For (36" box, 24" box, & 15 gal.) trees planted within the limit of:
Curbs and Driveways use MODEL#UB18-2
 - For (36" box, 24" box, & 15 gal.) trees planted within the limit of:
Sidewalks and concrete drainage swales use MODEL#LB12-2



HILLSIDE PLANTING MANAGEMENT AND COMPOSITION NOTES

- The following information pertains to the slope areas of approximately 30' in width adjacent to the new construction.
- Phase 1: Post-Building Construction
- Prune existing vegetation within 100' corridor of buildings to meet California Fire Code Regulations including but not limited to the following: remove deadwood from all shrubs and trees, raise tree canopies, and maintain appropriate distances between shrubs. Maintain all existing native vegetations so that it is free of deadwood, annual weedy grasses, and is properly spaced and mulched.
 - Remove existing trees and shrubs, which while green does not provide sufficient erosion control to slipping slopes on east side of property. Remove annual weedy grasses.
 - Water 20'-30' perimeter of slope areas adjoining campus buildings, particularly in the months prior to the fire season, which has expanded in recent years.
 - Keep the area (min 1') immediately adjacent to the site perimeter walls free of vegetation and where possible provide additional wall height with a vegetation free zone to collect embers which may roll down the slopes in the event of a fire. Concrete swales at the back of the perimeter retaining walls would fulfill this need.
- Phase 2: Planting
- Plant slope as needed to manage erosion with *Ceanothus 'Yankee Point'* (California Lilac), *Galvesia speciosa* (Island Snapdragon), and *Ribes viburnifolium* (evergreen Currant) as groundcover. Irrigation will be managed with an appropriate controller utilizing a weather tracking component which takes into consideration appropriate evapotranspiration and precipitation rates.
 - Mulch all plant material on slopes with 6" shredded bark excluding any large material such as twigs, pinecones, sticks, etc. Mulch must lay flat on the ground and be replenished as it decomposes.
 - Maintain plant material so that it is free of deadwood.
- The unstable nature of the surrounding slopes, the exposure to wildfires, and the desire to maintain the slopes in a visually pleasing manner is a common setoff conditions for much of California. Because wildfires, rainfall, and climate change collectively provide a set of complex and unpredictable criteria for hillside management which is constantly undergoing revision by both regulatory and horticultural agencies, it must be recognized that the above recommendations and practices do not guarantee immunity from wildfires or landslides, but represent an assessment of current practices and existing site conditions which attempt to balance the existing natural conditions with a visually pleasing environment.



ORDINANCE NO. 186873

An ordinance amending provisions of Sections 12.21, 17.02, 17.05, 17.06, 17.51, 46.00, 46.01, 46.02, 46.03, 46.04, and 46.06 of the Los Angeles Municipal Code (LAMC) to include the Mexican Elderberry (*Sambucus mexicana*) and Toyon (*Heteromeles arbutifolia*) shrubs in the class of protected trees and shrubs, and to update related regulations protecting such vegetation.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Section 1. Subdivision 12 of Subsection A of Section 12.21 of the Los Angeles Municipal Code is amended to read as follows:

12. Protected Tree and Shrub Relocation and Replacement. All existing protected trees and shrubs and relocation and replacement trees and shrubs specified by the Advisory Agency in accordance with Sections 17.02, 17.05, 17.06, 17.51 and 17.52 of this Code shall be indicated on a plot plan attached to the building permit issued pursuant to this Code. In addition, the trees or shrubs shall be identified and described by map and documentation as required by the Advisory Agency. A Certificate of Occupancy may be issued by the Department of Building and Safety, provided the owner of the property or authorized person representing the owner of the property (licensed contractor) obtains from the Advisory Agency, in consultation with the City's Chief Forester and prior to the final inspection for the construction, a written or electronic document certifying that all the conditions set forth by the Advisory Agency relative to protected trees have been met.

Sec. 2. The definition of Protected Tree in Section 17.02 of the Los Angeles Municipal Code is amended to read as follows:

Protected Tree or Shrub – Any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub:

Protected Trees:

(a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to Southern California but excluding the Scrub Oak (*Quercus berberidifolia*).

- (b) Southern California Black Walnut (*Juglans californica*)
- (c) Western Sycamore (*Platanus racemosa*)
- (d) California Bay (*Umeellularia californica*)

Protected Shrubs:

- (a) Mexican Elderberry (*Sambucus mexicana*)
- (b) Toyon (*Heteromeles arbutifolia*)

The definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.

Sec. 3. The definition of Tree Expert in 17.02 of the Los Angeles Municipal Code is amended to read as follows:

Tree Expert – A person with at least four years of experience in the business of transplanting, moving, caring for and maintaining trees who is one or more of the following: (a) a certified arborist with the International Society of Arboriculture and who holds a valid California license as an agricultural pest control advisor; or (b) a certified arborist with the International Society of Arboriculture and who is a licensed landscape architect; or (c) a registered consulting arborist with the American Society of Consulting Arborists.

Sec. 4. Subdivision 7 of Subsection H of Section 17.05 of the Los Angeles Municipal Code is amended to read as follows:

7. Where the Advisory Agency finds the project is consistent with the dwelling unit density permitted by the General Plan, and that the public health, safety or welfare and good subdivision design will be promoted by the preservation of protected trees and shrubs, the Advisory Agency may permit the required area of one or more of the lots in a subdivision in an "RA," "RE," "RS" or "R1" Zone to be reduced by an amount sufficient to provide for protected tree and shrub preservation in accordance with Section 17.05 R. of this Code. However, in no event shall the reduction exceed 50 percent of the required lot area; no "RA" or "RE" lot shall be reduced below 50 feet in width; no "RS" or "R1" lot shall be reduced below 40 feet in width; and no lot in a designated "K" Horsekeeping District shall be reduced below 17,500 square feet.

Sec. 5. Subsection R of Section 17.05 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

R. Protected Tree or Shrub Regulations. No protected tree or shrub may be relocated or removed except as provided in this article or Article 6 of Chapter IV of

this Code. The term "removed" or "removal" shall include any act that will cause a protected tree or shrub to die, including but not limited to acts that inflict damage upon the root system or other parts of the tree or shrub by fire, application of toxic substances, operation of equipment or machinery, or by changing the natural grade of land by excavation or filling the drip line area around the trunk.

1. **Required Determinations.** Subject to historical preservation requirements set forth in Subdivision 3 of this subsection, when a protected tree or shrub exists within a proposed subdivision, the tree or shrub may be relocated or removed if the Advisory Agency, in consultation with the City's Chief Forester, determines the existence of either (a) or (b) below:

(a) There has been prior applicable government action in which:

(i) The removal of the tree or shrub had been approved by the Advisory Agency; or

(ii) The property upon which the protected tree or shrub is located has been the subject of a determination by the City Planning Commission, the City Council, a Zoning Administrator, or an Area Planning Commission, the appeal period established by this Code with respect to the determination has expired, the determination is still in effect, and pursuant to the determination, the protected tree or shrub's removal would be permissible; or

(iii) A building permit has been issued for the property upon which the protected tree or shrub is located, the permit is still in effect, and the removal or relocation is not prohibited by the permit.

(b) The removal of the protected tree or shrub would not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters that cannot be mitigated to the satisfaction of the City's Chief Forester, and the physical condition or location of the tree or shrub is such that:

(i) Its continued presence in its existing location prevents the reasonable development of the property; or

(ii) According to a report required pursuant to Section 17.06 C acceptable to the Advisory Agency, and prepared by a Tree Expert, there is a substantial decline from a condition of normal health and vigor of the tree or shrub, and its restoration through appropriate and economically reasonable preservation procedures and practices is not advisable; or

(iii) It is in danger of falling due to an existing and irreversible condition; or

(iv) Its continued presence at its existing location interferes with proposed utility services or roadways within or without the subject property, and the only reasonable alternative to the interference is the removal of the tree or shrub; or

(v) It has no apparent aesthetic value which will contribute to the appearance and design of the proposed subdivision; or it is not located with reference to other trees, shrubs or monuments in such a way as to acquire a distinctive significance at the location.

2. **Supplemental Authority.** In the event the Advisory Agency, in consultation with the City's Chief Forester, determines pursuant to Subdivision 1(b) above, that a protected tree or shrub may be removed or relocated, the Advisory Agency may:

(a) Require relocation elsewhere on the same property where a protected tree or shrub has been approved for removal, and where the relocation is economically reasonable and favorable to the survival of the tree or shrub. Relocation to a site other than upon the same property may be permitted where there is no available or appropriate location on the property and the owner of the proposed off-site relocation site consents to the placement of a tree or shrub. In the event of relocation, the Advisory Agency may designate measures to be taken to mitigate adverse effects on the tree or shrub.

(b) Permit protected trees or shrubs of a lesser size, or trees or shrubs of a different protected species, to be planted as replacement trees or shrubs for protected trees or shrubs permitted by this Code to be removed or relocated, if replacement trees or shrubs required pursuant to this Code are not available. In that event, the Advisory Agency may require a greater number of replacement trees or shrubs.

3. **Historical Monuments.** The Advisory Agency, except as to Subdivision 1(b)(iii) above, shall require retention of a protected tree or shrub at its existing location, if the tree or shrub is officially designated as an Historical Monument or as part of an Historic Preservation Overlay Zone.

4. **Requirements.** In the event the Advisory Agency, in consultation with the City's Chief Forester, determines pursuant to Subdivision 1(b) above that a protected tree or shrub may be removed or relocated, the Advisory Agency shall require that:

(a) The protected tree or shrub be replaced within the property by at least four specimens of a protected variety included within the definition set forth in Section 17.02 of this article, except where the protected species is relocated pursuant to Subdivision 2(a) above. A protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works (Board), or a licensed or certified arborist. When replacement concerns more than two protected trees or shrubs, the permit at issue shall be considered at a full public hearing at the Board. The size of each replacement tree shall be a 15-gallon or larger specimen, measuring one inch or more in diameter at a point one foot above the base, and not less than 7 feet in height, measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

(b) The subdivider record those covenants and agreements approved by the Advisory Agency to assure compliance with conditions imposed by the Advisory Agency and to assure protected tree and shrub preservation.

(c) The subdivider provide protected tree and shrub maintenance information to purchasers of lots within the proposed subdivision.

(d) The subdivider post a bond or other assurance acceptable to the City Engineer to guarantee the survival of trees and shrubs required to be replaced or permitted or required to be relocated, in a manner to assure the existence of continuously living trees and shrubs at the approved replacement or relocation site for three years from the date that the trees or shrubs are replaced or relocated. The City Engineer shall use the provisions of Section 17.08 G as its procedural guide in satisfaction of the bond requirements and processing. Any bond required shall be in a sum estimated by the City Engineer to be equal to the dollar value of the replacement tree or shrub or of the tree or shrub that is to be relocated. In determining value for these purposes, the City Engineer shall consult with the Advisory Agency, the City's Chief Forester, the evaluation of trees guidelines approved and adopted for professional plantsmen by the International Society of Arboriculture, the American Society of Consulting Arborists, the National Arborists Association and the American Association of Nurserymen, and other available local information or guidelines.

5. **Grading.** The Advisory Agency is authorized to prohibit grading or other construction activity within the drip line of a protected tree or shrub.

Sec. 6. Subdivision 13 of Subsection B of Section 17.06 of the Los Angeles Municipal Code is amended to read as follows:

13. The approximate location and general description of any large or historically significant trees or shrubs and of any protected trees or shrubs and an indication as to the proposed retention or destruction of the trees or shrubs.

Sec. 7. Subsection C of Section 17.06 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

C. Protected Tree and Shrub Reports for Tentative Tract Maps. No application for a tentative tract map approval for a subdivision where a protected tree or shrub is located shall be considered complete unless it includes a report, in a form acceptable to the Advisory Agency and the City's Chief Forester, which pertains to preserving the tree or shrub and evaluates the subdivider's proposals for the preservation, removal, replacement or relocation of the tree or shrub. The report shall be prepared by a Tree Expert and shall include all protected trees and shrubs identified pursuant to Section 17.06 B.13 of this Code. In the event the subdivider proposes any grading, land movement, or other activity within the drip line of a protected tree or shrub referred to in the report, or proposes to relocate or remove any protected tree or shrub, the report shall also evaluate any mitigation measures proposed by the subdivider and their anticipated effectiveness in preserving the tree or shrub.

Sec. 8. Subsection D of Section 17.51 of the Los Angeles Municipal Code is amended to read as follows:

D. Protected Tree or Shrub Reports for Parcel Maps. No application for a preliminary parcel map approval for a parcel where a protected tree or shrub is located shall be considered complete unless it includes a report pertaining to preserving the tree or shrub. The report shall be prepared by a Tree Expert and shall evaluate the subdivider's proposals for protected tree or shrub preservation, removal, replacement and/or relocation. In the event the subdivider proposes any grading, land movement, or other activity within the drip line of any protected tree or shrub referred to in the report, or proposes to relocate or remove any tree or shrub, the report shall also evaluate any mitigation measures proposed by the subdivider and the anticipated effectiveness of preserving the tree or shrub.

Sec. 9. Section 46.00 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 46.00. PROTECTED TREE AND SHRUB REGULATIONS.

No protected tree or shrub may be relocated or removed except as provided in Article 7 of Chapter 1 or this article. The term "removed" or "removal" shall include any act that will cause a protected tree or shrub to die, including, but not limited to, acts that inflict damage upon the root system or other part of the tree or shrub by fire, application

of toxic substances, operation of equipment or machinery, or by changing the natural grade of land by excavation or filling the drip line area around the trunk.

Sec. 10. Section 46.01 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 46.01. DEFINITION.

"PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub:

Protected Trees:

- (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*).
- (b) Southern California Black Walnut (*Juglans californica*)
- (c) Western Sycamore (*Platanus racemosa*)
- (d) California Bay (*Umeellularia californica*)

Protected Shrubs:

- (a) Mexican Elderberry (*Sambucus mexicana*)
- (b) Toyon (*Heteromeles arbutifolia*)

This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

Sec. 11. Section 46.02 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 46.02. REQUIREMENTS FOR PUBLIC WORKS PERMITS TO RELOCATE OR REMOVE PROTECTED TREES AND SHRUBS.

No person shall relocate or remove any protected tree or shrub, as that term is defined in Section 46.01, where the protected tree or shrub is not regulated pursuant to Article 7 of Chapter I of this Code, without first having applied for and obtained a permit

from the Board of Public Works or its designated officer or employee, except as otherwise provided in this section.

An application for a permit shall indicate, in a manner acceptable to the Board of Public Works, by number on a plot plan, the location of each protected tree or shrub, and shall identify each protected tree or shrub proposed to be retained, relocated or removed. If any grading is proposed that may affect the protected tree or shrub, a copy of the grading permit plan in compliance with Division 70 of Article 1 of Chapter IX of this Code shall be submitted with the application.

(a) **Exemptions.** The Board of Public Works shall exempt from and not require issuance of a permit for the relocation or removal of a protected tree or shrub where the Board is satisfied that:

1. The proposed relocation or removal of the protected tree or shrub has been approved by the Advisory Agency pursuant to Article 7 of Chapter I of this Code; or

2. The land upon which the protected tree or shrub is located has been the subject of a determination by the City Planning Commission, the City Council, a Zoning Administrator or an Area Planning Commission, the appeal period established by this Code with respect to the determination has expired, the determination is still in effect, and pursuant to the determination the protected tree's or shrub's removal would be permissible; or

3. A building permit has been issued for any property and is still in effect with respect to the property under consideration and its implementation would necessitate the removal or relocation.

(b) **Board Authority.** The Board of Public Works may grant a permit for the relocation or removal of a protected tree or shrub, unless otherwise provided in this section or unless the tree or shrub is officially designated as an Historical Monument or as part of an Historic Preservation Overlay Zone, if the Board determines that the removal of the protected tree or shrub will not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters, which cannot be mitigated to the satisfaction of the City; and

1. It is necessary to remove the protected tree or shrub because its continued existence at the location prevents the reasonable development of the subject property; or

2. The protected tree or shrub shows a substantial decline from a condition of normal health and vigor, and restoration, through appropriate and economically reasonable preservation procedures and practices, is not advisable; or

3. Because of an existing and irreversible adverse condition of the protected tree or shrub, the tree or shrub is in danger of falling, notwithstanding the tree or shrub having been designated an Historical Monument or as part of an Historic Preservation Overlay Zone.

(c) **Additional Authority.** The Board of Public Works or its authorized officer or employee may:

1. Require as a condition of a grant of permit for the relocation or removal of a protected tree or shrub, that the permittee replace the tree or shrub within the same property boundaries by at least four specimens of a protected variety included within the definition set forth in Section 46.01 of this Code, in a manner acceptable to the Board. A protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works (Board), or a licensed or certified arborist. When replacement concerns more than two protected trees or shrubs, the permit at issue shall be considered at a full public hearing at the Board. Each replacement tree shall be at least 15-gallon or larger, measuring one inch or more in diameter one foot above the base, and be not less than 7 feet in height measured from the base. The size and number of replacement trees or shrubs shall approximate the value of the tree or shrub to be replaced.

2. Permit protected trees or shrubs of a lesser size or trees or shrubs of a different protected species to be planted as replacement trees or shrubs, if replacement trees or shrubs of the size and species otherwise required pursuant to this Code are not available. In that event, a greater number of replacement trees or shrubs may be required.

3. Permit a protected tree or shrub to be moved to another location on the property, provided that the environmental conditions of the new location are favorable to the survival of the tree or shrub, and there is a reasonable probability that the tree or shrub will survive.

Sec. 12. Subsection (a) of Section 46.03 of the Los Angeles Municipal Code is amended to read as follows:

(a) A permit issued pursuant to this article shall (1) specify and approve the location or locations to which said tree or shrub may be relocated, (2) designate the species, number, and size of any replacement trees or shrubs, and (3) set forth any other conditions or requirements deemed necessary by the Board of Public Works, or its authorized officer or employee, to implement the provisions of this article.

Sec. 13. Section 46.04 of the Los Angeles Municipal Code is amended to read as follows:

A fee shall be charged for issuance of any permit pursuant to this article, which permits the removal of one or more protected trees or shrubs. The fee shall be determined and adopted in the same manner as provided in Section 12.37 I.1. of the Los Angeles Municipal Code for establishing fees.

Sec. 14. Section 46.06 of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 46.06. WITHHOLDING OR REVOCATION OF BUILDING PERMITS FOR ILLEGAL REMOVAL OR RELOCATION OF PROTECTED TREES AND SHRUBS.

(a) The Bureau of Street Services, after notice and hearing pursuant to Subsections (b) and (c) of this section, shall have the authority to request the Superintendent of Building to withhold issuance of building permits, except for permits that are necessary to comply with a Department of Building and Safety order, for a period of time up to a maximum of ten years as requested by the Bureau and to revoke any building permit issued for which construction has not commenced with respect to any property on which any protected tree or shrub has been removed or relocated in violation of Section 46.00 of this Code.

The request shall be made in writing by the Director of the Bureau of Street Services or his/her designee and shall specifically state the start date and end date of the period of time the Bureau, or the Board of Public Works on appeal, have deemed necessary pursuant to Subsection (c) of this section. The period shall commence on the date the Bureau first becomes aware of the removal of the tree or shrub; provided, however, the authority of the Bureau to act shall not apply to a purchaser, or to his or her agent, who in good faith and for valuable consideration has acquired title to the property subsequent to the illegal removal or relocation of any protected trees and prior to the recordation of the notice of intent as provided for in Subsection (b) of this section.

(b) The Bureau shall notify the applicant or permittee in writing of its intent to act pursuant to this section. The notice shall state that the applicant or permittee may submit any evidence it deems relevant on this matter, the hearing to be held on a date specified in the notice. A copy of the notice shall also be mailed to the owner of the property, if different from the applicant or permittee, as shown on the last equalized assessment roll, and to any person holding a deed of trust, mortgage, or other security interest in the property as revealed by a title search with respect to the property. A copy of the notice shall also be recorded by the Bureau with the County Recorder.

(c) The Bureau hearing shall be set on a date no earlier than 20 days after the date of the mailing of the notice provided for in Subsection (b) above. At the hearing, if the facts indicate, the Bureau shall make a finding that the applicant or

permittee is not a purchaser in good faith and for valuable consideration who acquired title to the property subsequent to the illegal removal or relocation of the protected tree or shrub and prior to the recordation of the notice of intent as provided for in Subsection (b) above. In the event the Bureau finds that a protected tree or shrub was removed or relocated in violation of Section 46.00 of this Code, it shall specify to the Superintendent of Building the length of time the issuance of building permits shall be withheld and whether building permits for which construction has not commenced shall be revoked. In making its determination, the Bureau shall consider the following factors: the number of trees and/or shrubs removed or relocated; the size and age of the trees or shrubs removed or relocated; the knowledge and intent of the owners of the property with respect to the removal or relocation; and prior violations of law with respect to removal or relocation of protected trees and shrubs. The applicant or permittee shall be notified in writing of the Bureau's determination within 30 days of the hearing.

(d) The applicant or permittee may appeal to the Board of Public Works any determination by the Bureau to request the Superintendent of Building to revoke or withhold issuance of building permits, including the length of time imposed. The appeal must be filed with the Board of Public Works within 30 days of the date of mailing of the notice of determination as provided for in Subsection (c) above. Further, any action by the Department of Building and Safety resulting from any of the provisions of this section, including building permit revocation, shall not be appealable to the Board of Building and Safety Commissioners.

(e) Any final determination of the Bureau or the Board of Public Works on appeal, to request the Superintendent of Building to withhold issuance of building permits or to revoke a building permit, shall be forwarded to the Superintendent within ten days of the Bureau or Board's determination and shall also be set forth in an affidavit, which shall be recorded by the Bureau with the County Recorder within ten days of the Bureau or Board's determination.

Sec. 15. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

Approved as to Form and Legality


MICHAEL N. FEUER, City Attorney

By 
ADRIENNE KHORASANEE
Deputy City Attorney

Date 12/11/20

File No. 13-1339

Pursuant to Charter Section 559, I **disapprove** this ordinance on behalf of the City Planning Commission and recommend that it **not** be adopted.


VINCENT P. BERTONI, AICP
Director of Planning

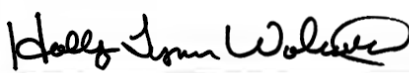
Date 12-9-20

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The Clerk of the City of Los Angeles hereby certifies that the foregoing ordinance was passed by the Council of the City of Los Angeles, **by a vote of not less than two-thirds** of all its members.

CITY CLERK

MAYOR





Ordinance Passed 12/15/2020

Approved 12/28/2020

Published Date: 01/04/2021
Ordinance Effective Date: 02/04/2021
Council File No.: 13-1339

22.174.010 - Purpose.

The Oak Tree Permit is established: (a) to recognize oak trees as significant historical, aesthetic, and ecological resources, and as one of the most picturesque trees in Los Angeles County, lending beauty and charm to the natural and manmade landscape, enhancing the value of property, and the character of the communities in which they exist; and (b) to create favorable conditions for the preservation and propagation of this unique, threatened plant heritage, particularly those trees which may be classified as heritage oak trees, for the benefit of current and future residents of the County.

It is the intent of the Oak Tree Permit to maintain and enhance the general health, safety and welfare by assisting in counteracting air pollution and in minimizing soil erosion and other related environmental damage. The Oak Tree Permit is also intended to preserve and enhance property values by conserving and adding to the distinctive and unique aesthetic character of many areas of the County in which oak trees are indigenous. The stated objective of the Oak Tree Permit is to preserve and maintain healthy oak trees in the development process.

(Ord. 2019-0004 § 1, 2019.)

22.174.020 - Definitions.

Specific terms used in this Chapter are defined in Section 22.14.150 of Division 2 (Definitions), under "Oak Tree Permits."

(Ord. 2019-0004 § 1, 2019.)

22.174.030 - Applicability.

- A. Damaging or Removing Oak Trees Prohibited — Permit Requirements. Except as otherwise provided in Subsection B, below, a person shall not cut, destroy, remove, relocate, inflict damage, or encroach into a protected zone of any tree of the oak genus which is:
1. 25 inches or more in circumference (eight inches in diameter) as measured four and one-half feet above mean natural grade; in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 38 inches (12 inches in diameter) as measured four and one-half feet above mean natural grade, on any lot within the unincorporated area of the County; or
 - 2.

Any tree that has been provided as a replacement tree, pursuant to 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 as provided by this Chapter.

B. Exemptions. An Oak Tree Permit is not required for:

1. Any oak tree related to any permit, variance, or tentative map for a subdivision, including a minor land division, approved by the Board, Commission, Hearing Officer, or the Director prior to August 20, 1982, the effective date of this Chapter.
2. Cases of emergency caused by an oak tree being in a hazardous or dangerous condition through structural weakness, insect damage or decay, or being irretrievably damaged or destroyed through flood, fire, wind, or lightning, as determined after visual inspection by the County Forester. Following this determination, the County Forester shall issue an Oak Tree Permit Exemption that will be filed with Regional Planning and expire in 90 days. Upon expiration, the tree must be re-inspected by the County Forester for a new Oak Tree Permit Exemption to be issued.
3. Emergency or routine maintenance by a public utility necessary to protect or maintain an electric power or communication line or other property of a public utility.
4. Tree maintenance, limited to medium pruning of branches not to exceed two inches in diameter in accordance with guidelines published by the International Society of Arboriculture intended to ensure the continued health of a protected tree.
5. Trees planted, grown, or held for sale by a licensed nursery.
6. Trees within existing road rights-of-way where pruning is necessary to obtain adequate line-of-sight distances and/or to keep street and sidewalk easements clear of obstructions, or to remove or relocate trees causing damage to roadway improvements or other public facilities and infrastructure within existing road rights-of-way, as required by the Director of Public Works.
7. Temporary housing, in accordance with Chapter 22.252 (Woolsey Fire Disaster Recovery), Chapter 22.254 (Lake and Bobcat Fires Disaster Recovery), Chapter 22.256 (Disaster Recovery), Chapter 22.258 (Temporary Housing After a Disaster), or Section 22.336.070.O (Rebuilding after Disaster).

(Ord. 2023-0038 § 14, 2023; Ord. 2023-0025 § 3, 2023; Ord. 2019-0004 § 1, 2019.)

22.174.040 - Application and Review Procedures.

- A. Application Checklist. The application submittal shall contain all of the materials required by the Oak Tree Permit Checklist.
- B. Additional Application Materials. In addition to Subsection A, above, the following application materials shall be required:

1. Site Plan. The application shall require a site plan showing:
 - a. Proposed construction, excavation, grading and/or landfill. Where a change in grade is proposed, the change in grade within the protected zone of each plotted tree shall be specified.
 - b. The location of all oak trees subject to this Chapter proposed to be removed, damaged, encroached, or relocated, or within 200 feet of proposed construction, grading, landfill or other activity. Each tree shall be assigned an identification number on the plan, and a corresponding permanent identifying tag shall be affixed to the north side of each tree in the manner prescribed by Section 22.174.070 (Conditions of Approval). These identifications shall be utilized in the Oak Tree Report and for physical identification on the property where required. The protected zone shall be shown for each plotted tree.
 - c. Location and size of all proposed replacement trees.
 - d. Location of all surface drainage systems.
2. Oak Tree Report.
 - a. An Oak Tree Report certified to be true and correct shall be prepared by an individual with expertise acceptable to the Director and the Fire Department. The Oak Tree Report, as deemed acceptable by the Director and the Fire Department, shall identify each oak tree on the site plan as required by Subsection B.1, above, and shall contain the following information:
 - i. The name, address, telephone number, and business hours of the preparer.
 - ii. Evaluation of the physical structure of each tree as follows:
 - (1) The circumference and diameter of the trunk, measured four and one-half feet above natural grade;
 - (2) The diameter of the tree's canopy, plus five feet, establishing the protected zone;
 - (3) Aesthetic assessment of the tree, considering factors such as but not limited to symmetry, broken branches, unbalanced crown, excessive horizontal branching; and
 - (4) Recommendations to remedy structural problems where required.
 - iii. Evaluation of the health of each tree as follows:
 - (1) Evidence of disease, such as slime flux, heart rot, crown rot, armillaria root fungus, exfoliation, leaf scorch, and exudations;
 - (2) Identification of insect pests, such as galls, twig girdler, borers, termites, pit scale, and plant parasites;
 - (3) Evaluation of vigor, such as new tip growth, leaf color, abnormal bark, deadwood, and thinning of crown;

- (4) Health rating based on the archetype tree of the same species; and
 - (5) Recommendations to improve tree health, such as insect or disease control, pruning, and fertilization.
- iv. Evaluation of the applicant's proposal as it impacts each tree shown on the site plan, including suggested mitigating and/or future maintenance measures where required and the anticipated effectiveness thereof.
 - v. Identification of those trees shown on the site plan which may be classified as heritage oak trees.
 - vi. Identification of any oak tree officially identified by a County resource conservation district.
 - vii. Any other information required by the Director or the Fire Department.
- b. The requirement for an Oak Tree Report may be waived by the Director where a single tree is proposed for removal in conjunction with the use of a single-family residence listed as a permitted use in the zone, and/or such information is deemed unnecessary for processing the applications.

C. Review Procedures.

1. Multiple applications shall be in compliance with Section 22.222.060 (Multiple Applications).
2. Application filing and withdrawal shall be in compliance with Section 22.222.070 (Application Filing and Withdrawal).
3. Fees and deposits shall be in compliance with Section 22.222.080 (Fees and Deposits).
4. Initial application review shall be in compliance with Section 22.222.090 (Initial Application Review).
5. Project evaluation and staff report shall be in compliance with Section 22.222.110 (Project Evaluation and Staff Report).

D. Application Without a Public Hearing.

1. An application to remove, encroach, or relocate not more than one oak tree in conjunction with a single-family residence permitted in the zone with a Ministerial Site Plan Review (Chapter 22.186), shall be filed and processed in compliance with this Subsection D and this Chapter. An oak tree defined as a Heritage Oak Tree in Chapter 22.14 (Definitions), shall not be eligible for review per this Subsection D, but shall be reviewed in accordance with Subsection E, below.
2. When making a decision on the application in accordance with Section 22.226.040 (Decision), the Director may apply development standards to ensure compliance with this Chapter, including, but not limited to:
 - a.

22.174.050 - Review of Oak Tree Report by the Fire Department.

- A. The Fire Department shall review the Oak Tree Report for accuracy of statements contained therein and shall make inspections on the project site. Such inspections shall determine the health of all oak trees on the project site and such other factors as may be necessary and proper to complete the review. A copy of the Fire Department's review shall be submitted in writing to the Director within 15 days after its completion. The review shall not be considered complete until the applicant pays to the Fire Department any fees and deposits for oak tree inspections and report reviews as required in Section 328 (Land Development and Environmental Review Fees) of Title 32 of the County Code.
- B. The Fire Department may suggest conditions for use by the Commission, Hearing Officer, or Director pursuant to Section 22.174.070 (Conditions of Approval).
- C. When the Fire Department determines that replacement or relocation on the project site of oak trees proposed for removal is inappropriate, the Fire Department may recommend that the applicant pay into the Oak Forests Special Fund the amount equivalent to the oak resource value of the trees described in the Oak Tree Report. The oak resource value shall be calculated by the applicant and approved by the Fire Department according to the most current edition of the International Society of Arboriculture's "Guide to Establishing Values for Trees and Shrubs."
- D. Funds collected for the Oak Forests Special Fund shall be used for the following purposes only:
 - 1. Establishing and planting new trees on public lands.
 - 2. Maintaining existing oak trees on public lands.
 - 3. Purchasing prime oak woodlands.
 - 4. Purchasing sensitive oak trees of cultural or historic significance.
- E. Not more than seven percent of the funds collected may be used to study and identify appropriate programs for accomplishing the purposes set forth in Subsection D, above.

(Ord. 2019-0004 § 1, 2019.)

22.174.060 - Findings.

- A. Common Procedures. Findings and decision shall be made in compliance with Section 22.222.200 (Findings and Decision) and include the findings in Subsection B, below.
- B. Findings.
 - 1. The proposed construction or proposed use will be accomplished without endangering the health of the remaining oak trees subject to Title 22 regulations, if any, on the subject property.
 - 2.

The removal or relocation of the oak trees proposed will not result in soil erosion through the diversion or increased flow of surface waters which cannot be satisfactorily mitigated.

3. In addition to the above facts, at least one of the following findings apply:

- a. That the removal or relocation of the oak trees proposed is necessary as continued existence at present locations frustrates the planned improvement or proposed use of the subject property to such an extent that:
 - i. Alternative development plans cannot achieve the same permitted density or that the cost of such alternative would be prohibitive, or
 - ii. Placement of such oak trees precludes the reasonable and efficient use of such property for a use otherwise authorized;
- b. That the oak trees proposed for removal or relocation interferes with utility services or streets and highways, either within or outside of the subject property, and no reasonable alternative to such interference exists other than removal of the trees; or
- c. That the condition of the oak trees proposed for removal with reference to seriously debilitating disease or danger of falling is such that it cannot be remedied through reasonable preservation procedures and practices.

4. The removal of the oak trees proposed will not be contrary to or be in substantial conflict with the intent and purpose of the Oak Tree Permit procedure.

C. Relocation of Trees. For purposes of interpreting this Section, it shall be specified that while relocation is not prohibited by this Chapter, it is a voluntary alternative offering sufficient potential danger to the health of an oak tree as to require the same findings as removal.

(Ord. 2022-0008 § 108, 2022; Ord. 2019-0004 § 1, 2019.)

22.174.070 - Conditions of Approval.

Conditions may be imposed to ensure that the approval will be in accordance with the findings required by Section 22.174.060 (Findings and Decision). Such conditions may involve, but are not limited to, the following:

- A. The replacement of oak trees proposed for removal or relocation with oak trees of a suitable type, size, number, location, and date of planting. In determining whether replacement should be required, the Commission, Hearing Officer, or Director shall consider but is not limited to the following factors:
 1. The vegetative character of the surrounding area.
 2. The number of oak trees subject to this Chapter which are proposed to be removed in relation to the number of such oak trees currently existing on the subject property.
 - 3.

The anticipated effectiveness of the replacement of oak trees, as determined by the Oak Tree Report submitted by the applicant and evaluated by the Fire Department.

4. The development plans submitted by the applicant for the proposed construction or the proposed use of the subject property.
5. The relocation of oak trees approved for removal shall not be deemed a mitigating factor in determining the need for replacement oak trees.
6. Replacement oak trees:
 - a. Required replacement oak trees shall consist exclusively of indigenous oak trees and shall be in the ratio of at least two to one. Each replacement oak tree shall be at least a 15-gallon size specimen and measure at least one inch in diameter one foot above the base. The Commission, Hearing Officer, or Director, in lieu of this requirement, may require the substitution of one larger container specimen for each oak tree to be replaced, where, in their opinion, the substitution is feasible and conditions warrant such greater substitution;
 - b. Replacement oak trees shall be properly cared for and maintained for a period of two years and replaced by the permittee if mortality occurs within that period;
 - c. Where feasible replacement oak trees should consist exclusively of indigenous oak trees and certified as being grown from a seed source collected in Los Angeles or Ventura Counties; and
 - d. Replacement oak trees shall be planted and maintained on the subject property and, if feasible, in the same general area where the oak trees were removed. The process of replacement of oak trees shall be supervised in the field by a person who, in the opinion of the Fire Department, has expertise in the planting, care, and maintenance of oak trees.
- B. A plan for protecting oak trees on the subject property during and after development, such as, but not limited to, the following requirements:
 1. The installation of chain link fencing not less than four feet in height around the protected zone of oak trees shown on the site plan. Said fencing shall be in place and inspected by the Fire Department prior to commencement of any activity on the subject property. Said fencing shall remain in place throughout the entire period of development and shall not be removed without written authorization from the Fire Department.
 2. Where grading or any other similar activity is specifically approved within the protected zone, the applicant shall provide an individual with special expertise acceptable to the Director to supervise all excavation or grading proposed within the protected zones and to further supervise, monitor and certify to the Fire Department the implementation of all conditions imposed in connection with the applicant's Oak Tree Permit.
 - 3.

Any excavation or grading allowed within the protected zone or within 15 feet of the trunk of an oak tree, whichever distance is greater, be limited to hand tools or small hand-power equipment.

4. Oak trees on other portions of the subject property not included within the site plan also be protected with chain link fencing thus restricting storage, machinery storage, or access during construction.
 5. The oak trees on the site plan be physically identified by number on a tag affixed to the north side of the tree in a manner preserving the health and viability of the tree. The tag shall be composed of a noncorrosive all-weather material and shall be permanently affixed to the tree. The oak tree shall be similarly designated on the site plan in a manner acceptable to the Director.
 6. Corrective measures for oak trees noted on the Oak Tree Report as requiring remedial action be taken, including pest control, pruning, fertilizing, and similar actions.
 7. To the extent feasible as determined by the Director, utility trenching shall avoid encroaching into the protected zone on its path to and from any structure.
 8. At the start of grading operations and throughout the entire period of development, no person shall perform any work for which an Oak Tree Permit is required unless a copy of the Oak Tree Report, location map, fencing plans, and approved Oak Tree Permit and conditions are in the possession of a responsible person and also available at the site.
- C. The applicant shall provide an oak tree information manual prepared by and available from the Fire Department to the property owner, subsequent property owner, and any homeowners association.

(Ord. 2019-0004 § 1, 2019.)

22.174.080 - Notice of Action.

The Director shall issue and mail a notice of action in compliance with Section 22.222.220 (Notice of Action).

(Ord. 2019-0004 § 1, 2019.)

22.174.090 - Effective Date of Decision and Appeals.

- A. The effective date of decision and appeals shall be in compliance with Section 22.222.230 (Effective Date of Decision and Appeals).
- B. Notwithstanding Section 22.222.230 (Effective Date of Decisions and Appeals), the decision of the Hearing Officer or Director shall become final and effective unless an appeal is timely filed pursuant to Chapter 22.240 (Appeals).
- C.

The decision of the Commission on an application or on an appeal shall be final and effective on the date of decision. Appeal of an Oak Tree Permit application to the Board is only allowed where an Oak Tree Permit is concurrently considered with a permit, variance, zone change, or tentative map for a subdivision, including a minor land division, and such Oak Tree Permit shall be appealable only as a part of an appeal on the concurrent entitlement. Said appeal must be made within the applicable time period and shall be subject to the applicable procedures established for appealing the concurrent entitlement.

(Ord. 2019-0004 § 1, 2019.)

22.174.100 - Post-Decision Actions and Regulations.

- A. Documentation, scope of approval, and Exhibit "A" shall be in compliance with Section 22.222.240 (Documentation, Scope of Approval, and Exhibit "A").
- B. Use of property before final action shall be in compliance with Section 22.222.250 (Use of Property Before Final Action).
- C. Performance guarantee and covenant shall be in compliance with Section 22.222.260 (Performance Guarantee and Covenant).
- D. Expiration date and extension for unused permits and reviews shall be in compliance with Section 22.222.270 (Expiration Date and Extension for Unused Permits and Reviews).
- E. Cessation of use shall be in compliance with Section 22.222.280 (Cessation of Use).

(Ord. 2019-0004 § 1, 2019.)

22.174.110 - Enforcement.

In interpreting Chapter 22.242 (Enforcement Provisions) as they apply to this Chapter, each individual tree cut, destroyed, removed, relocated, or damaged in violation of these provisions shall be deemed a separate offense.

(Ord. 2019-0004 § 1, 2019.)

APPENDIX B

Traffic Memorandum

TECHNICAL MEMORANDUM

Date: March 20, 2025

To: Kent Tsujii, Senior Civil Engineer, Los Angeles County Public Works

From: Brian Marchetti, AICP, Project Manager

Subject: Olive View-UCLA Medical Center Campus Final EIR 1st Addendum –
Traffic Analysis for Continuum of Care Facility

The Los Angeles County Department of Public Works proposes to construct a new mental health facility providing long-term psychiatric care (Continuum of Care facility) on the interior of the Olive View-UCLA Medical Center Campus (Campus). This new building is proposed to be added to the Olive View-UCLA Medical Center Master Plan evaluated in a previous Environmental Impact Report (EIR), see discussion below. The proposed addition of this building and associated surface parking area is referred to as the 2025 Master Plan Revisions. The address for the Campus is 14445 Olive View Drive, Sylmar (Los Angeles), CA 91342; the site is located on Assessor Parcel Number: 2582-003-905.

Master Plan Addressed in Final EIR

A Final Environmental Impact Report (EIR) was certified in October 2019 that addresses future development on the entire Campus (Olive View-UCLA Medical Center Campus Master Plan Final EIR, State Clearinghouse Number 2016031090). The Final EIR evaluated two tiers of development:

- Tier I is comprised of near-term projects to be developed through the year 2035; the Final EIR indicates that on completion of Tier I, the Olive View-UCLA Medical Center would generate 9,973 daily trips, a net increase of 3,841 new daily trips. The Final EIR identified the following to be included in Tier I:
 - **Construction**
 - 48-units Recuperative Care — 16,356 sf
 - 80-unit Residential Treatment Program — 47,035 sf
 - MHUCC — 10,000 sf
 - Mental health Wellness Center — 10,000 sf
 - Ambulatory Care Center — 296,000 sf
 - Community Center — 20,000 sf
 - Central Plant — 77,000 sf
 - Materials Management/Supply — 68,100 sf
 - Administration — 96,000 sf
 - Total New — 640,491 sf**
 - 674-space parking structure
 - 1,369 surface parking spaces total available in Tier I.

- **Demolition**
 - Hospital use — 4,300 sf
 - Central Plant — 51,000 sf
 - Materials Management/Supply — 32,500 sf
 - Administration — 52,300 sf
 - Support Services Building — 16,800 sf
- Tier II development was anticipated to occur beyond 2035 and to include the construction of a new inpatient hospital, Long-Term Care facility, support services building, retail space, County department buildings, and the renovation and reuse of the existing inpatient hospital for other purposes.

Build-out of the campus under the 2019 Master Plan (Tiers I and II) was anticipated to result in a net increase in building square footage of approximately 1.3 million square feet, throughout the Campus with a net increase of 10,509 daily trips (for a total of 16,641 daily trips).

Master Plan Progress to Date

The Recuperative Care Village (consisting of the 16,356 square foot, 48-bed Recuperative Care Center; 47,035 -square foot, 80-bed Residential Treatment Program; 10,000-square foot Mental Health urgent care Center; and 10,000-square foot Mental Health Wellness Center) was completed and occupied in September 2021 (a total of about 83,391 square feet).

A feasibility study for an Ambulatory Care Center, new central plant and warehouse is currently being prepared. Future funding, building sizes and construction timeframes have not yet been determined. The balance of Tier I will proceed as funding becomes available. Tier II is still considered to occur after 2035.

Proposed 2025 Master Plan Revisions

The Continuum of Care facility is proposed to be a three-story approximately 55,000-square foot, 48-bed building located south of Hillside Drive and north of Bucher Avenue. The Continuum of Care facility would be constructed as part of Tier I. However, this specific building and use was not identified in the Final EIR. It would contain three programs:

1. Enriched Residential Services (ERS); the average stay for patients in this program is 22 months.
2. Psychiatric Health (PHF); the average stay for patients in this program is 82 days.
3. Mental Health Rehabilitation (MHRC); the average stay in this program is 18 months but can be shorter or longer.

Each floor would have 36 employees for a total of 108 employees. The employees would be spread across three shifts (12 per program per shift or 36 total per shift): 7 am to 3 pm, 3 pm to 11 pm, and 11pm to 7am. Employees would not arrive during peak period traffic. 36 employees would depart at 3 pm at the start of the pm peak period. Visitors would be allowed between 9 am and 5 pm for the PHF and MHRC programs; up to 10 visitors per day for each of these programs (20 total visitors per day to the building) are anticipated. No visitors are anticipated to the ERS program.

Primary access is anticipated to be from Olive View Drive and then north on West Way. Surface parking (up to approximately 95 surface spaces that would be allocated to the proposed Continuum of Care facility) would be provided south of the building site across Bucher Avenue. Ample parking is provided throughout the Campus that is available for Campus related uses. Hillside Drive adjacent to the building site to the north would be widened to 26 feet (from the existing approximately 10 feet to 13 feet wide) and a turnaround on Hillside Drive would be provided at the northeast corner of the site; Bucher

Avenue would be widened to 20 feet adjacent to the parking area (from the existing approximately about 17 feet wide).

Analysis

Because of the unique use, trip generation for the proposed building was estimated using the approach used in the Final EIR for special needs housing: $0.8 (108 \text{ staff} \times 2 \text{ trips per day}) = 173 \text{ trips per day}$ for project staff plus $20 \times 2 \text{ trips}$ for visitors = 213 trips per day (about 2% of total trips at the end of Tier I). Due to the timing of shift changes and the modest number of visitors few trips are anticipated during the peak hours. The facility is designed to accommodate 48 patients with stays that average many months (see above) thus the average number of trips by patients would be negligible.¹

Because the Olive View-UCLA Medical Center is located in the City of Los Angeles and provides services to local City residents (who would have to travel further if services were provided elsewhere), for this EIR the County deferred to the City of Los Angeles (Final EIR page 3.15-21) for the thresholds to be used to evaluate the Olive View-UCLA Medical Center project traffic impacts. The Final EIR was certified in 2019 and still used delay and peak hour Level of Service as thresholds to determine the significance of traffic impacts. The Final EIR identifies less than significant impacts for Tier I traffic, and potentially significant impacts at two, and possibly other, intersections for Tier II post 2035. The Continuum of Care facility would not be expected to change the Tier I level of significance based on Level of Service due to the minimal number of trips during peak hours.

Since certification of the Final EIR, both the City and County have adopted new thresholds for evaluating traffic impacts based on vehicle miles traveled (VMT). The City's screening threshold for determining whether a new traffic study is needed is a net increase of 250 trips per day. In addition, the City of Los Angeles Transportation Assessment Guidelines (July 2020) indicate public service uses are presumed to have less than significant VMT impacts (page 2-7). The County Transportation Impact Analysis Guidelines (July 2020) do not specifically address public service uses and indicate that Public Works would determine the appropriate threshold for such land uses; in this case Public Works is deferring to City guidelines.

As a health facility providing essential public services to the local community, the use is necessary and could reduce the need for some patients to seek treatment in facilities further away. As a local public serving use the facility would tend to substitute shorter trips for longer trips and overall VMT could decrease because health services would be provided closer to the community served.

The proposed use is a low-density use that generates relatively few trips per square foot. Trips are primarily from employees who work shifts that generally do not overlap with the congested peak hours. Employees are generally anticipated to be located within the community. In addition, with respect to employee travel, the County has a number of policies and programs to encourage and facilitate use of transit, bicycles and electric vehicles as appropriate.

¹ Approximately 32 trips spread over 22 months for the ERS, 32 trips spread over 18 months for the MHRC and 32 trips spread over 82 days for the PHF.

Conclusion

The Continuum of Care facility would be required to comply with the traffic mitigation measure requiring preparation of a Traffic Control Plan -- MM-TRAF-1. (The Final EIR does not identify any other traffic mitigation measures.) The new facility would generate a less than significant increase in trips compared to what was previously evaluated. As a local-serving use the facility would tend to substitute shorter trips for longer trips and overall VMT could decrease because health services would be provided closer to the community served. No further analysis of traffic issues is necessary. No changes are proposed to the mitigation measure. Any further changes to Tier I and Tier II development will be subject to further review of potential traffic impacts.



RESUMES

BRIAN MARCHETTI, AICP

SENIOR TRANSPORTATION PLANNER

Mr. Marchetti is a Senior Transportation Planner at KOA, managing traffic impact, access and pedestrian circulation, parking, and transit planning studies. He has 23 years of experience in the industry. He has extensive experience with traffic impact analysis and active transportation studies, with coordination on project CEQA documents, and with on-call planning services for local cities. Mr. Marchetti has produced studies for environmental documentation on multiple projects, ranging from large commercial centers, mixed-use development projects, residential tract developments, public utilities projects, public facility and park projects, institutional and school facility traffic impact and pedestrian access projects, to transit and station interface projects. He is a Member of the American Institute of Certified Planners (AICP), #016504.

RELEVANT EXPERIENCE

On-Call Engineering & Planning Services, Glendale, CA

KOA is providing traffic engineering and transportation planning services to the City of Glendale that include review of traffic impact studies, site access and circulation design reviews, pedestrian circulation studies, parking studies, and transportation modeling analyses. Design efforts include review of site access, off-site traffic improvements, on-site parking layouts, on-site delivery truck loading zones, on-site vehicle, delivery truck and pedestrian circulation. Peer reviews of traffic studies are a particular focus of KOA's efforts on this project, and those reviews include reviews of and comparisons to city-wide and other nearby traffic studies, reviews of study scoping documents, review of applied growth, project trip generation, cumulative projects inclusion, level of service calculations accuracy, and site vehicle and pedestrian access issues. KOA provided these services through task orders issued by the City, and worked directly with City engineering staff to supplement their daily efforts.

West Covina On-Call Engineering Services, West Covina, CA

KOA is a part of the City of West Covina's engineering department preferred traffic engineering consultant list for traffic impact and parking studies. KOA coordinates directly with the City on the project scoping process during the proposal effort and submits the draft product to the City for review and comment prior to the completion of the study. Current and/or recent project include:

- West Covina Self Storage traffic impact study (424 South Lark Ellen Avenue)
- Toyota of West Covina traffic impact study
- 520 South Lark Avenue traffic impact study
- LA Fitness traffic and parking study
- West Covina Lakes Office Complex Parking Study and Design Study
- West Covina Orange Medical Plaza traffic study
- 1700 West, West Covina Parkway traffic study



EDUCATION

Bachelor of Science, Urban & Regional Planning, California State Polytechnic University, Pomona

REGISTRATIONS

American Institute of Certified Planners, #016504

PROFESSIONAL AFFILIATIONS

American Planning Association, Member

Southern California Planning Congress, Vice President of Communications

Los Angeles County Regional Planning History Association



Brian Marchetti, AICP, Page 2

West Hollywood Avenues Streetscape TIS, West Hollywood, CA

Project Manager. KOA assisted the design process for this project by providing input on the probable effects of proposed streetscape elements on traffic flow, parking availability, and area valet operations. KOA used traffic volumes from recent traffic studies, the General Plan, and focused collection of new data, to analyze traffic conditions without and with potential project-related changes at major intersection approaches. KOA provided recommendations on general design issues that could negatively affect traffic without commensurate benefits to bicyclists or pedestrians. KOA was present at design charrettes and meetings with the project advisory group. KOA reviewed proposed sidewalk extension and raised median locations related to the project, to determine potential impacts to major driveway access, pedestrian crossing patterns, and turning movement patterns. A thorough traffic engineering assessment was conducted by KOA to illustrate the trade-offs associated with different alternatives on city streets in terms of traffic delay, alternate mode accommodation and safety. The final report included discussion on project options and differences in roadway operations with related roadway reconfigurations.

San Gabriel 400-420 West Valley Boulevard TIS, San Gabriel, CA

Principal-In-Charge. KOA prepared a traffic impact study for the proposed mixed-use project at 400-420 West Valley Boulevard, in the City of San Gabriel. KOA produced previous traffic impact study reports for various land use proposals for the same property. The new proposed project was to be larger, with approximately 20,000 more square feet of commercial area, and approximately 70 more residential units. The project site would include north and south access points, with one of those locations providing direct access into a residential neighborhood. A neighborhood impact analysis of three roadway segment locations was included in the analysis.

El Segundo Smoky Hollow Specific Plan Traffic/Parking Study

Principal-In-Charge. KOA provided a traffic/circulation and parking analysis for this Specific Plan Update. The goal was to assist in promoting a new development within the plan area, focusing on high-tech, entertainment and business incubator industries and related support services. This area is transitioning away from the traditional light industrial uses that historically served the local aerospace and oil refinery industries. The City's overall goal for the area, however, is to create a unique mixed-use office/industrial district. KOA conducted a traffic analysis of constraints and subsequent impacts of opportunity sites and/or land use changes, and conducted a parking study to identify the general availability on-street parking and its configurations and regulations. The study examined pedestrian walking routes, transit access via an existing City shuttle service that links corporate areas to the downtown area, and linkages to the existing and future bicycle facility network. KOA made recommendations for improvements to these routes and linkages. An analysis of the downgrading of a Secondary Arterial classification to a commercial collector classification was included in the effort.

LA Street Civic Building EIR / Parker Center Site

Project Manager. The City of Los Angeles proposed to redevelop the Parker Center site, which was the former location of the Los Angeles Police Department Headquarters Building. The City needed architectural conceptual designs and an environmental impact report prepared for three potential project alternatives, which included adaptive re-use of the existing building, partial demolition and renovation of the existing building, and demolition of the existing building then replacement with a new one-million square-foot building. KOA's scope of work for this project included preparation of the needed traffic study for incorporation into the EIR document. KOA's traffic impact analysis covered an expansive area of downtown Los Angeles for each of the proposed project alternatives.

East Los Angeles Specific Plan, Los Angeles, CA

Project Manager. KOA conducted the traffic and parking analysis for the proposed East Los Angeles Specific Plan, encompassing all properties located within one-half mile radii of the four Metro Gold Line stations, and other targeted parcels between the boundaries of Cesar Chavez Avenue, Indiana Avenue, Whittier Boulevard, and Margaret Avenue. The environmental documentation was to be a program document, identifying potential impacts for buildout of the specific plan area, and the overall cumulative impacts of Specific Plan and area development. The traffic study focus on potential impacts within and adjacent to the proposed mixed-use corridors and related land use intensification, calculation of increased trip generation and related reductions for shared uses, pass-by trips, and transit use, and examination of potential parking demand and recommended parking requirements.