

4.0 ENVIRONMENTAL IMPACT ANALYSIS

H. LAND USE AND PLANNING

1. INTRODUCTION

Development on the Harbor-UCLA Campus is guided by the policies and regulations of several regional and Los Angeles County (County) plans. The provisions set forth in these plans and regulations have been adopted to promote orderly land use development and eliminate or reduce the potential land use conflicts from development. This section describes the existing land use conditions on and in the vicinity of the Harbor-UCLA Campus, identifies the existing land use plans and regulations applicable to the Project, and evaluates Project consistency with these plans and regulations and compatibility with adjacent land uses. The information in this section is based primarily on County 2035 General Plan Update and associated EIR, County Planning and Zoning Code (Title 22 of the Los Angeles County Code or LACC), and the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016RTP/SCS).

For evaluation of the consistency of the Project with applicable land use regulations pertaining to air quality, see Sections 4.B., Air Quality, and 4.E., Greenhouse Gas Emissions, of this Draft EIR. For evaluation of the consistency of the Project with applicable land use regulations pertaining to population/housing and transportation/parking, see Sections 4.J., Population and Housing, and 4.L., Transportation and Traffic, respectively, of this Draft EIR. For evaluation of the growth-inducing impacts of the Project, see Chapter 6.0, Other CEQA Considerations, of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Project Site

The 72-acre Harbor-UCLA Campus is located in the unincorporated Los Angeles County community of West Carson, which in turn is located in the County's South Bay Planning Area. The South Bay Planning Area occupies the southwestern portion of the County from the City of Inglewood in the north to the cities of Rancho Palos Verdes and San Pedro in the south, and from the 710 Freeway in the east to the Pacific Ocean to the West. The West Carson Community is centrally located within the South Bay Planning Area, encompassing the roughly 2.3-square-mile area between Del Amo Boulevard on the north and Lomita Boulevard on the south, and the Harbor Freeway (I-110) on the east and Normandie Avenue on the west. As indicated in **Figure 4.H-1, Project Site and Surrounding Land Uses**, the Project Site lies within a fully urbanized area bordered by Carson Street on the north, 220th Street on the south, Vermont Avenue on the east, and Normandie Avenue on the west. Unincorporated area lies immediately north, south and east of the Project Site. The City of Los Angeles lies immediately west of the Project Site, across Normandie Avenue, while the City of Carson lies one block east of the Project Site, across the Harbor Freeway. Local vehicular access to the Project Site is provided by each of the four streets bordering the site, while regional vehicular access is provided by the Harbor Freeway via Carson Street, and by the San Diego Freeway (I-405), which lies approximately two miles to the north and east, via Vermont Avenue, Normandie Avenue, and Carson

Street. The Metro Transit Station (Silver Line) is located on Carson Street, approximately 0.10 miles to the east along the Harbor Freeway.

The Project Site is generally flat and developed with 1,279,284 square feet of floor area, including the Harbor-UCLA Medical Center and multiple medical and research tenants. Harbor-UCLA is a County-owned and -operated tertiary-care medical center and one of only five Level 1 Trauma Centers in the County. It serves southwestern County of Los Angeles and plays a particularly critical role in meeting the healthcare needs of the more than 700,000 residents of the greater South Bay region within 15 miles of the Campus, the catchment or service region for the Medical Center. Harbor-UCLA Medical Center is licensed for 453 inpatient beds and houses more than 70 primary and secondary care clinics. A premiere teaching hospital with a strong research focus, the Hospital employs full- and part-time faculty physicians, volunteer faculty physicians, and both residents and fellows completing graduate studies at the Hospital. The three major tenants collocated on the Project Site together with the Hospital include the following:

- LA BioMed: LA BioMed, the largest tenant, was founded as the Harbor-UCLA Research and Education Institute in 1952 and is currently one of the largest independent not-for-profit biomedical research institutes in the nation. It conducts and supports research, training, and education activities, provides community services including childhood immunization and nutrition assistance, and maintains an affiliation with the Harbor UCLA Medical Center, with many faculty members serving as both researchers and clinicians; this affiliation helps attract top residency candidates to Harbor UCLA Medical Center.
- Harbor-UCLA Medical Foundation, Inc. (MFI): MFI was founded in 1963 as a nonprofit organization dedicated to clinical patient care, the revenue from which is used to fund clinical, research, and educational activities at the Harbor-UCLA Medical Center.
- Children's Institute International (CII): CII, which specializes in the treatment and prevention of child abuse and neglect, operates its Burton E. Green Campus and provides services to families throughout the South Bay and adjacent communities. CII is headquartered near downtown Los Angeles and operates several facilities throughout the region.

A number of County departments, including offices of the Department of Mental Health, also occupy buildings on the Campus.

Existing buildings heights at the Project Site range from one to eight floors, with the existing Hospital Tower in the northeast portion of the Site representing the tallest building. The existing floor-area ratio (FAR) at the Site is 0.40:1, while total existing employment at the site (including the Hospital and both major and minor tenants) is approximately 5,500. See Figure 2-3, Existing Campus Buildings, in Chapter 2.0, *Project Description*, of this Draft EIR for an illustration of the layout of the existing buildings, parking areas, and internal streets at the Project Site.

(2) Surrounding Uses

As indicated in Figure 4.H-1, the Project Site is fully surrounded by urban uses. These include commercial uses with a small amount of high-density residential across Carson Street to the north; residential uses and a surface parking lot across 220th Street to the south; commercial and residential uses across Vermont Avenue

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to the east, and residential uses across Normandie Avenue in the west. A more detailed description of the surrounding land uses is provided below:

- **North:** Carson Street to the north is largely developed with commercial uses, primarily neighborhood retail businesses and medical/dental services. The Harbor-UCLA Medical Center Employee Children’s Center (daycare center) and a multifamily residential apartment complex, Harbor Cove Villa, are located on Carson Street just west of Vermont Avenue. The area north of the commercial uses on Carson Street is a predominantly single-family residential neighborhood.
- **East:** Vermont Avenue, bordering the Harbor-UCLA Campus to the east, is developed with a mix of neighborhood retail uses and medical services just north and south of Carson Street, while the southern half of the block facing the Harbor-UCLA Campus, at 219th Street, is developed with a condominium complex, Torrance Park Villas, and Starlite Trailer Park and Rainbow Mobile Home Park, which back up to the Harbor Freeway on the west. Wholesale and light industrial uses, primarily warehouses and truck distribution centers, are located to the southeast along 220th Street.
- **South and West:** Single-family and multi-family residential neighborhoods border the Harbor-UCLA Campus to the south, across 220th Street, as well as to the west, across Normandie Avenue within the Harbor City community of Los Angeles; the abandoned Union Pacific Railroad right-of-way area along the west side of Normandie Avenue serves as a setback for residential uses to the west. An off-site surface parking lot serving LA BioMed is located across 220th Street from the Harbor-UCLA Campus.

(3) Existing General Plan Land Use Designations and Zoning

As indicated in **Figure 4.H-2, County of Los Angeles – General Plan Land Use Designations**, the Project Site is designated “P” (Public and Semi-Public) by the County of Los Angeles 2035 General Plan Update (General Plan Update). The “P” General Plan Land Use (GPLU) designation permits a broad range of public and semi-public facilities and community-serving uses, including public buildings and campuses, schools, hospitals, cemeteries, fairgrounds, airports and other major transportation facilities, landfills, solid and liquid waste disposal sites, multiple use storm water treatment facilities, and major utilities at a maximum FAR of 3:1.¹ Also, in the event that the public or semi-public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community character, are permitted.²

In addition, the General Plan Update indicates that the western two-thirds of the Project Site fall within the boundaries of the 110 Freeway/Carson Station Transit Overlay District (TOD) due to its proximity to the Metro Transit Station (Silver Line) located on Carson Street, approximately 0.10 miles to the east.³ TODs are areas within a ½-mile radius of a major transit stop that have development/design standards and incentives to facilitate transit-oriented development specifically tailored to the unique characteristics and needs of the local community.⁴ However, the West Carson TOD Specific Plan, which is to specify the development/design

¹ *County of Los Angeles, County of Los Angeles General Plan Update (2035), Chapter 6: Land Use Element, Table 6.2, Land Use Designations. Adopted October 6, 2015.*

² *Ibid.*

³ *Ibid, Figure 6.5 and page 72.*

⁴ *Ibid.*

standards and incentives for the 110 Freeway/Carson Station TOD, has not yet been prepared or adopted.⁵ Therefore, the West Carson TOD Specific Plan is not addressed further in this section.

Finally, the Project Site is not located within an adopted community plan area.

As indicated in **Figure 4.H-3, County of Los Angeles – Zoning**, the Project Site is zoned C-3 (Unlimited Commercial) by the LACC. The C-3 zone permits a broad range of commercial uses, including but not limited to offices, universities/colleges, medical clinics, and medical research/laboratories (LACC §22.28.180), as well as hospitals and helistops. The maximum FAR in the C-3 zone is 13:1 (LACC §22.52.050), and the maximum height is 13 times the buildable area (LACC §22.52.050).

Hospital and ancillary uses on the Harbor-UCLA Campus are currently consistent with the current GPLU designation and zoning of the Project Site.

b. Regulatory Framework Summary

Development on the Project Site is guided by the policies and regulations of several regional and local plans, as well as by the County's 2035 General Plan Update and Zoning Ordinance (Title 22 of the LACC). The provisions set forth in these plans and regulations have been adopted to promote orderly land use development and to eliminate or reduce potential land use conflicts from development. What follows is a discussion of the land use provisions of these plans and ordinances applicable to the Project.

(1) Federal and State

No federal or State land use regulations are applicable to the proposed Project and the land use impact analysis.

(2) Regional

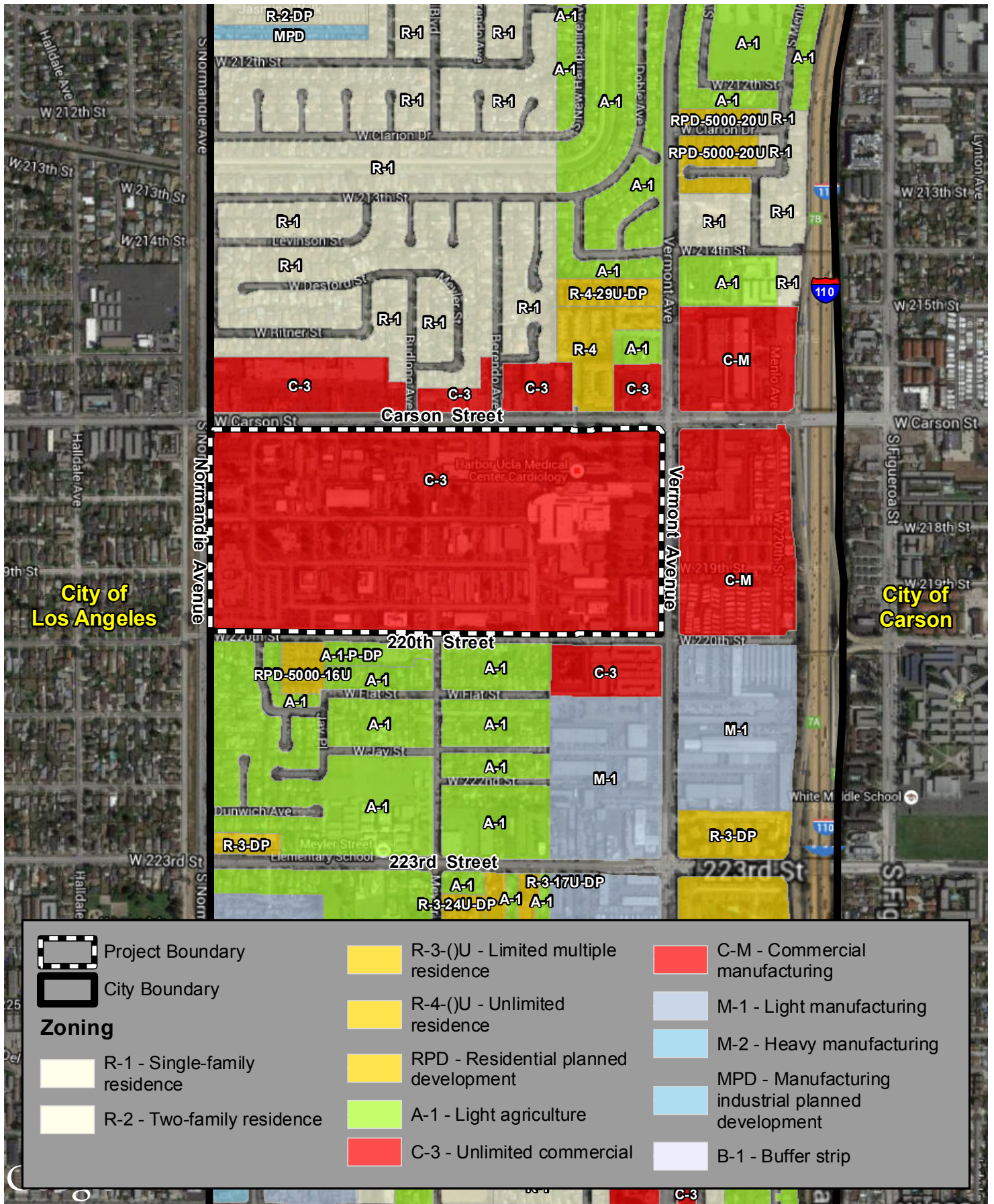
(a) SCAG - 2008 Regional Comprehensive Plan

SCAG is designated by the federal government as the Metropolitan Planning Organization and Regional Transportation Planning Agency for the Southern California region. SCAG's, a joint powers agency with responsibilities pertaining to regional planning issues and a jurisdiction covering Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura Counties. SCAG addresses regional planning issues through various plans and programs, including the Regional Comprehensive Plan (RCP), Compass Growth Visioning (including the Compass Blueprint 2% Strategy)⁶, and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

SCAG's 2008 RCP, the most recent RCP, was accepted by SCAG for use as an advisory document that may be voluntarily used by local jurisdictions when developing local plans and addressing local issues of regional

⁵ According to the County's website (<http://planning.lacounty.gov/tod/plans>), the County is planning to prepare a West Carson TOD Specific Plan and associated EIR commencing in Spring 2016, with public hearings on these documents anticipated in Spring 2017.

⁶ The Compass Blueprint 2% Strategy is a guideline for how and where the Growth Vision for Southern California's future can be implemented. It calls for changes to current land use and transportation trends on only 2 percent of the land area of the region.



County of Los Angeles - Zoning

Harbor-UCLA Medical Center Master Plan

Source: Google Maps, 2015 (Aerial); County of Los Angeles, 2015; PCR Services Corporation, 2015.

FIGURE

4.H-3

significance. The RCP addresses issues related to housing, traffic/transportation, water, and air quality. Local governments are asked to consider the RCP's recommendations in the preparation of local plans and approval of development projects. The RCP is also closely linked to, and serves as a basis for, the preparation of SCAG's RTP/SCS and Compass Plan. The RCP contains the following land use and air quality goals relevant to the Project:

- Land Use: Successfully integrate land and transportation planning, and achieve land use and housing sustainability, by implementing the Compass Blueprint 2% Strategy, which includes following:
 - Focus growth in existing and emerging centers and along major transportation corridors;
 - Create significant areas of mixed-use development and walkable, "people-scaled" communities;
 - Target growth in housing, employment, and commercial development within walking distance of existing and planned transit stations;
 - Inject new life into under-used areas by creating vibrant new business districts, redeveloping old buildings, and building new businesses and housing on vacant lots;
 - Preserve existing stable single-family neighborhoods; and
 - Protect important open space, environmentally sensitive areas, and agricultural lands from development.
- Air Quality:
 - Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM<10, PM2.5, ultrafine), and carbon monoxide; and
 - Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.

(b) SCAG - 2008 Compass Growth Visioning (including Compass Blueprint 2% Strategy)

SCAG also engages in the Compass Growth Visioning effort that addresses the regional development pattern so as to accommodate future development and provide land use patterns that improve mobility, reduce vehicle miles traveled, and support the goals and policies established in the RTP. The Growth Vision is driven by four key principles: mobility – getting where we want to go; livability - creating positive communities; prosperity - long-term health for the region; and sustainability - preserving natural surroundings. To realize these principles on the ground, the Growth Vision encourages:

- Focusing growth in existing and emerging centers and along major transportation corridors
- Creating significant areas of mixed-use development and walkable communities
- Targeting growth around existing and planned transit stations
- Preserving existing open space and stable residential areas

As part of the visioning effort, the Compass Blueprint 2% Strategy provides guidance for how and where SCAG can implement the Growth Vision for Southern California's future. It calls for modest changes to current land use and transportation trends on only 2% of the land area of the region. Directing the changes to the selected 2% of the land identified produces the greatest policy achievement for the least land affected.

The Growth Visioning effort encourages clustering/densification of population activity in proximity to certain transportation facilities.

(c) SCAG - 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016- RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. Also, the 2016 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning and the provision of services by other regional agencies. The SCS portion presents an overall land use concept for the region with increasing focus on densification of urban areas and development around transit stations and increased focus on use of transit and active transportation. The goals of the 2016 RTP/SCS are as follows:

- Align plan investments and policies with improving regional economic development and competitiveness;
- Maximize mobility and accessibility for all people and goods in the region;
- Ensure travel safety and reliability for all people and goods in the region;
- Preserve and ensure a regional transportation system;
- Maximize the productivity of our transportation system;
- Protect the environment and health of residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking);
- Actively encourage and create incentives for energy efficiency, where possible;
- Encourage land use and growth patterns that facilitate transit and non-motorized transportation.; and
- Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

(d) SCAQMD - 2012 Air Quality Management Plan

The South Coast Air Quality Management District's (SCAQMD's) administers the Air Quality Management Plan (AQMP). The 2012 AQMP, the most recent AQMP, presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions. The SCAQMD, which was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act, is responsible for bringing air quality in the South Coast Air Basin (Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. Project consistency with the AQMP is addressed in Section 4.B., *Air Quality*, of this Draft EIR.

(e) Metro - 2010 Congestion Management Program

The County of Los Angeles Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The 2010 CMP, the most recent CMP, summarizes the results of 18 years of CMP highway and transit monitoring and 15 years of monitoring local growth. CMP implementation guidelines for local jurisdictions are also contained in the 2010 CMP. The primary goal of the CMP is to reduce traffic congestion in order to enhance the economic vitality and quality of life for affected communities. CMP guidelines specify that those freeway segments to which a proposed project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of designated CMP roadway intersections to which a proposed project could add 50 or more trips during either peak hour. Project consistency with the CMP is addressed in Section 4.L., *Transportation and Traffic*, of this Draft EIR.

(3) Local

(a) County of Los Angeles - 2035 General Plan Update

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The County of Los Angeles 2035 General Plan Update was approved and adopted by the Board October 6, 2015. The General Plan Update serves as a document to provide decision-makers with a policy framework to guide specific, incremental decisions to achieve the Plan's stated goals and objectives which focus on fostering healthy, livable, and sustainable communities. It contains nine elements, including Land Use, Mobility, Air Quality, Conservation and Natural Resources, Parks and Recreation, Noise, Safety, Public Services and Facilities, and Economic Development.

The Project Site is located in County's South Bay Planning Area, one of 11 Planning Areas which make up the County, but is not located within an adopted County Specific Plan area. The Project Site is designated P (Public and Semi-Public) by the General Plan Update which permits a broad range of public and semi-public uses, including but not limited to hospitals, universities/colleges, offices, medical clinics, and medical research/laboratories, at a maximum FAR of 3:1⁷. The western two-thirds of the Project Site is designated as a TOD by the General Plan Update due to its proximity to the Metro Transit Station (Silver Line), which has associated with it development and design standards and incentives to facilitate transit-oriented development.⁸

(b) County of Los Angeles - Planning and Zoning Code (LACC Title 22)

The County of Los Angeles Planning and Zoning Code (LACC Title 22) sets forth zoning designations and other regulations pertinent to land use. Title 22.12 establishes individual zoning designations, area requirements, density of land occupancy, and the necessary, proper and comprehensive groupings and arrangements of the various industries, businesses and population of the County in policy established by the Land Use Element of the General Plan. As discussed previously, the Project Site is zoned C-3, General Commercial. The C-3 zone permits a broad range of commercial uses, including but not limited to offices,

⁷ *County of Los Angeles, County of Los Angeles General Plan Update (2035), Chapter 6: Land Use Element, Table 6.2, Land Use Designations. Adopted October 6, 2015.*

⁸ *Ibid*, p.72.

universities/colleges, medical clinics, and medical research/laboratories (LACC §22.28.180), as well as hospitals and helistops. Within the C-3 zone: the maximum FAR in the C-3 zone is 13:1 (LACC §22.52.050); the maximum height is 13 times the buildable area (LACC §22.52.050)⁹; there are no minimum building setbacks¹⁰; and the maximum permitted lot coverage is 90% of net lot area, with 10% of net lot area landscaped (LACC §22.28.220).

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potential land use impacts in this section of the Draft EIR evaluates: (1) Project consistency with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect; and (2) Project compatibility with existing adjacent land uses.

The evaluation of Project consistency with applicable land use plans, policies and regulations is based upon a review of the land use plans identified above. State *CEQA Guidelines* Section 15125(d) requires that an EIR discuss inconsistencies with applicable land use plans that the decision-makers should address. Evaluations are made as to whether a Project would further plan provisions or actively obstruct their implementation. The intention of the evaluation is to determine whether any noncompliance would result in a significant adverse physical impact on the environment. Accordingly, the criterion for determining significance with respect to a land use plan emphasizes substantive conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that a mere inconsistency with a plan, policy, or regulation does not necessarily equate to a significant impact on the environment.

The evaluation of Project compatibility with existing adjacent off-site land uses focuses on whether the nature (type, scale, height, location) of existing on-site land uses would substantially change under the Project, and if yes, whether this would adversely impact the character of the area as perceived by the existing adjacent off-site land uses.

b. Thresholds of Significance

The potential for land use and planning impacts is based on thresholds derived from the County's Initial Study Checklist questions, which are based on Appendix G of the State CEQA Guidelines. These questions are as follows:

(XI) Land Use and Planning. Would the project:

- a) Physically divide an established community?

⁹ *The height of buildings, except where otherwise provided, shall be determined as follows: The total floor area in all the buildings on any one parcel of land shall not exceed 13 times the buildable area of such parcel of land. Cellar floor space, parking floor space with necessary interior driveways and ramps thereto, or space within a roof structure or penthouse for the housing of building operating equipment or machinery shall not be considered in determining the total floor area within a building.*

¹⁰ *County of Los Angeles website: http://planning.lacounty.gov/luz/summary/category/commercial_zones/. Accessed December 1, 2015.*

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

The Initial Study determined that the Project would have a less than significant impact with respect to Checklist question XI.a). Accordingly, this environmental topic is not evaluated in this EIR.

Based on the above factors, the Project would have a potentially significant impact on Land Use and Planning if it would result in any of the following:

LU-1: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

LU-2: Would the Project be incompatible with existing adjacent land uses?

c. Project Characteristics or Design Features

(1) Project Characteristics

The Master Plan Project encompasses construction of a new Hospital tower (New Hospital Tower) on schedule to meet increasing state law seismic requirements for acute care facilities, renovation of the existing Hospital building (Existing Hospital Tower) to house non-acute care support uses, replacement of aging facilities, reconfigured vehicular and pedestrian access to and circulation within the Harbor-UCLA Medical Center Campus, and implementation of a cohesive site design that enhances the experience of staff, patients, and visitors. The Campus-wide floor area would increase from 1,279,284 square feet to 2,457,355 square feet. The redesigned Harbor-UCLA Campus would consolidate outpatient facilities and locate them in proximity to the New Hospital Tower in the north-central Campus. It would also engage Carson Street by orienting Hospital-related services used by the community along this major thoroughfare. Courtyards, landscaped areas, and paths and sidewalks for pedestrian circulation would form the core of the Campus and connect the new Hospital Tower and outpatient facilities with the other major tenants on the Campus, including Los Angeles Biomedical Research Institute (LA BioMed) in the south-central Campus and the Children's Institute International (CII) Burton E. Green Campus in the northwest Campus. Patient and visitor vehicle access and parking would be realigned off Carson Street and staff vehicle access would be concentrated in the eastern and southeastern Campus off Vermont Avenue and 220th Street.

The western side of the Campus would be used for the development of a biotechnical research campus (Biosciences Campus). Implementation of the Master Plan Project is expected to meet short-term needs of the Hospital, associated facilities, and other tenants of the Campus, as well as long-term needs beyond 2030. It is anticipated that implementation of the Project would occur in approximately six phases, with construction commencing in 2017 and anticipated to be completed by 2030.

Under the proposed Project:

- Campus-wide floor area would increase from 1,279,284 sf to 2,457,355 sf (a net increase of 1,178,071 sf), due largely to the development of a new hospital tower, three new outpatient buildings, and the Bioscience Tech Park;
- Campus-wide FAR would increase from 0.40:1 to 0.78:1;
- The number of licensed in-patient hospital beds would decrease slightly from 453 to 446;
- Building heights across much of the Project Site would increase from an average of one to an average of four stories, with the tallest existing on-site building (the existing eight-floor Hospital Tower) retained and a second larger eight-floor building (New Hospital Tower) developed;
- Campus-wide parking would increase from 3,186 spaces (including 281 spaces in an off-site parking lot) to 4,240 spaces (including the spaces in the Bioscience Tech Park and in the off-site parking lot), due largely to the replacement of several on-site surface parking lots with three- to five-floor parking structures; and
- The number of Campus-wide employees would increase from approximately 5,464 to approximately 7,494.

See Chapter 2.0, *Project Description*, in this Draft EIR for more information, including but not limited to: Figure 2-4, Existing Campus Buildings; Figure 2-6, Harbor-UCLA Medical Campus Master Plan Site Plan; and Table 2-1, Harbor-UCLA Master Plan Project - Existing and Proposed Land Use Summary.

(a) Sign Program

Proposed signage will include identification and wayfinding to aid visitors and patients in finding their ultimate destinations into and within the Project Site. This would include signage at the two proposed public entryways into the Project Site on Carson Street, one proposed public entryway into the Project Site on Normandie Avenue, one staff and emergency ambulance entryway into the Project Site on Vermont Avenue, and two staff entryways into the Project Site on 220th Street, along with street, directional, and parking signage within the Project Site. All signage would be intended to serve the on-site uses and activity; no off-site signage (e.g., billboards, etc.) is proposed. The Project Sign Program would be reviewed by the Regional Planning Department (Director) to ensure Program consistency with applicable sign regulations (including LACC Section 6502.2. Permits would be obtained for signs and electrical permits for lighting in accordance with the Code.

(b) Sustainability Features

Long-term sustainability is an important principle guiding the Master Plan Project. The current County policy requires LEED Silver-level certification, or the equivalent, for any public facility over 10,000 square feet in floor area. Green building practices would be integrated into all building design, construction, and operation and would be integrated with Campus infrastructure and include integrated stormwater and wastewater treatment. Sustainability criteria include (1) green building metrics; (2) reduction of energy demand; (3) reduction of thermal energy needs; (4) water balance; and (5) use of healthy building materials. As the Master Plan Project is implemented, one or more of the following systems would be used for environmental performance certification.

- LEED for Healthcare Rating System / Green Guide for Healthcare: Campus Buildings are designed to meet the requirements of the USGBC's LEED for Healthcare, [Platinum] certification and incorporates LEED Pilot credits on healthy materials selection.
- LEED Application Guide for Multiple Buildings and On-Campus Building Projects: Utilize to exploit economies of scale and the unique challenges and opportunities inherent in Campus projects.
- Living Building Challenge: Achieve a majority of “petals” of the International Living Building Institute's Living Building Challenge 2.0.
- 2030 Challenge: Goals of each project to meet the 2030 Challenge relative to reduction requirements for the year constructed.
 - Targeting 100!: Utilize tools and approaches from research to meet the 2030 Challenge for the Hospital.

(c) Required Approvals

Implementation of the Master Plan Project would require the following approvals:

(i) State of California

- California Office of Statewide Health Planning and Development Approval
- Caltrans Division of Aeronautics Helistop Permit Approval

(ii) County of Los Angeles

- Certification of the Final EIR
- Project approval
- Approval of permits as may be required for component buildings and other structures
- Funding approval

(iii) Other Approvals

- Approval of permits for temporary construction activities associated with off-site infrastructure and/or traffic system improvements within other jurisdictions (if such improvements are ultimately necessary), including the cities of Los Angeles, Carson, and Torrance.

The Project has been designed to be consistent with the existing County General Plan land use designation (GPLU) and zoning of the Project Site, and would not include the subdivision of land. Therefore, no General Plan Amendments, Rezones, or Subdivisions are proposed or required.

(2) Project Design Features

The Master Plan Project does not include any specific Project Design Features (PDFs) that would apply to land use and planning.

d. Project Impacts

(1) Project Consistency with Applicable Land Use Plans, Policies, and Regulations

Threshold LU-1: Would the Project conflict with any applicable land use plan, policy, or regulation of an
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agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Statement LU-1: *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. Therefore, land use impacts associated with Project consistency with applicable land use plans, policies and regulations would be less than significant.*

Project consistency with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect are addressed below. This include analysis of Project consistency with the SCAG RCP, SCAG Compass Growth Visioning (including the Compass 2% Blueprint Strategy), SCAG RTP/SCS, County 2035 General Plan Update (including the GPLU designation of the Project Site), and the County Planning and Zoning Code (including the zoning of the Project Site).

Project consistency with two other applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect are addressed in other sections of this Draft EIR. These include the SCAQMD AQMP which is addressed in Section 4.B., *Air Quality*, and the Metro CMP which is addressed in Section 4.L., *Transportation and Parking*.

As indicated in the following subsections, the Project would be substantially consistent with applicable regional and local land use plans, policies and regulations. Therefore, impacts with respect to Threshold LU-2 would be less than significant.

(a) SCAG - 2008 Regional Comprehensive Plan

Table 4.H-1, *Comparison of the Project to Applicable Policies of the SCAG 2008 Regional Comprehensive Plan*, evaluates the consistency of the Project with applicable policies of the RCP. As discussed, the Project would be consistent with applicable RCP policies, including focusing growth in existing urban centers, creating walkable mixed-use development, targeting commercial and employment growth within walking distance of existing transit stations, injecting new life into under-used areas, preserving established neighborhoods, and protecting open space, environmentally-sensitive areas, and farmland. The Project would also include sustainability features in accordance with the County’s Green Building Program to reduce energy consumption, GHG emissions and pollution.

Table 4.H-1

Comparison of the Project to Applicable Policies of the SCAG 2008 Regional Comprehensive Plan

Goal/Policy	Analysis of Project Consistency
Land Use and Housing	
Policy: Focus growth in existing and emerging centers and along major transportation corridors	Consistent: The Project would focus growth within an existing urban center and along transportation corridors by nearly doubling urban density (from 0.40:1 to 0.78:1 FAR) on the Project Site which is located within a designated TOD and 0.10 miles of both a Metro Transit Station (Silver Line) and the Harbor Freeway.
Policy: Create significant areas of mixed-use development and walkable, “people-scaled”	Consistent: The Master Plan would create a significant area of walkable, “people-scaled” mixed use development by: including a mix of community-serving uses (e.g., hospital, outpatient facilities, ground floor retail, green areas,

Table 4.H-1 (Continued)

Comparison of the Project to Applicable Policies of the SCAG 2008 Regional Comprehensive Plan

Goal/Policy	Analysis of Project Consistency
communities.	etc.) oriented towards a major thoroughfare (Carson Street); providing a clear, well organized, and signed internal pedestrian circulation system; providing frontage improvements (sidewalk enhancements, street trees, benches) and internal landscaped pedestrian paths to increase foot traffic within the hospital Campus, and between the hospital Campus, the surrounding community, and the Metro Station located 0.10 mile to the east; and providing bicycle parking in accordance with LACC requirements.
Policy: Target growth in housing, employment, and commercial development within walking distance of existing and planned transit stations.	Consistent: The Project would target growth in employment within walking distance of the existing transit by nearly doubling commercial density (from 0.40:1 to 0.78:1 FAR) and increasing employment by approximately 37 percent (from approximately 5,464 to approximately 7,494) at the Project Site which is located approximately 0.10 mile from the Carson Street Metro Transit Station.
Policy: Inject new life into under-used areas by creating vibrant new business districts, redeveloping old buildings, and building new businesses and housing on vacant lots.	Consistent: The Project would inject new life into the 72-acre Project Site by: (1) redeveloping an existing under- and inefficiently-utilized site, portions of which contain many old World War II barracks, with new state of the art hospital and medical buildings; (2) consolidating hospital and major tenant functions in fewer buildings to increase efficiency; (3) replacing a piecemeal and confusing internal vehicular and pedestrian circulation system with a clear, well organized and well signed internal circulation system; and (4) potentially providing ground-floor retail, as well as outpatient facilities, and other community-serving uses along Carson Street to increase foot traffic between the hospital site, the surrounding community, and the Metro Station.
Policy: Preserve existing stable, single-family neighborhoods.	Consistent: The Project would be consistent with this policy because it would not displace residential uses or create new barriers to circulation to or within residential neighborhoods.
Policy: Protect important open space, environmentally sensitive areas, and agricultural lands from development.	Consistent: The Project would be consistent with this policy because it would represent redevelopment of an already fully developed urban property, which is surrounded on all sides by urban development, rather than the development of open space, environmentally sensitive areas, or agricultural lands.
Air Quality	
Policy: Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM10, PM2.5, ultrafine), and carbon monoxide.	Consistent: The Project would not include industrial, utility, mining, or other land uses most often associated with the emission of large quantities of toxic air contaminants (TACs), particulates or carbon monoxide. Furthermore, the Project would represent redevelopment of an already fully developed site, which is already a source of air emissions, rather than the development of a vacant site which is not currently a source of air emissions. Finally, as indicated in the analysis in Section 4.B, <i>Air Quality</i> , of this EIR, the Project would not result in significant unavoidable pollution-related health impacts associated with the emissions of TACs, particulates, or carbon monoxide.
Policy: Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to businesses and residents.	Consistent: Per the current County policy requiring LEED Silver-level certification or the equivalent for any public facility over 10,000 square feet in floor area, the Project would be designed and constructed to achieve LEED Silver-level certification or its equivalent. Green building practices would be incorporated into all building design, construction, and operation, and would be integrated with Campus infrastructure and stormwater/wastewater treatment.

Source: PCR Services Corporation, 2016.

(b) SCAG - 2008 Compass Growth Visioning (Including Compass 2% Blueprint Strategy)

Table 4.H-2, *Comparison of the Project to Applicable Policies of the SCAG 2008 Compass Growth Visioning (Including Compass 2% Blueprint Strategy)*, evaluates the consistency of the Project with applicable policies of the SCAG’s Compass Growth Visioning (including the Compass 2% Blueprint Strategy). As discussed, the Project would be consistent with applicable policies of these plans as it would improve mobility for all residents by providing an infill development along established transportation corridors, as well as in proximity to transit options and existing housing. Moreover, the Project would provide pedestrian walkways and landscaped setbacks to provide a “people-scaled” project. Lastly, the Project would include sustainability features in accordance with the County’s Green Building Program to reduce energy consumption, reduce GHG emissions, and reduce pollution.

**Table 4.H-2
Comparison of the Project to Applicable Policies of the
SCAG 2008 Compass Growth Visioning (including Compass 2% Blueprint Strategy)**

Goal/Policy	Analysis of Project Consistency
Principle #1: Improve mobility for all residents.	Consistent: The Project would represent infill development that would increase urban density along established transportation corridors (with existing bus service) and within 0.10 miles of both a Metro Transit Station (Silver Line) and the Harbor Freeway. The Project would allow for the continued provision of hospital and outpatient services and additional employment opportunities within the West Carson community and larger South Bay Planning Area, thereby reducing the need for residents to travel outside the local area for health care and work. Finally, the Project would create a significant area of walkable, people-scaled mixed use development by including a mix of community-serving uses oriented towards a major thoroughfare (Carson Street), providing a clear, well organized, and signed internal pedestrian circulation system, and providing frontage improvements along the bordering streets to increase foot traffic between the hospital Campus, the surrounding community, and the Metro Station. Therefore, the Project would improve mobility for all residents
Policy: Locate new housing near existing jobs and new jobs near existing housing.	Consistent: The Project would increase employment by approximately 37 percent (from approximately 5,464 to approximately 7,494) at a site near multiple residential neighborhoods and the Carson Street Metro Transit Station. Furthermore, the Project would allow for continued operation of the Harbor-UCLA Medical Center, thereby maintaining existing jobs near existing housing and avoiding the need for residents to travel outside the local area for health care services.
Policy: Promote a variety of travel choices.	Consistent: As discussed above, the Project would be developed within close proximity to several established transportation routes, the Harbor Freeway, and the Carson Street Metro Transit Station. Furthermore, the Project would create a walkable development by: including a mix of community-serving uses (e.g., hospital, outpatient facilities, potentially ground floor retail, green areas, etc.) oriented towards a major thoroughfare (Carson Street); providing a clear, well organized, and signed internal pedestrian circulation system; and providing frontage improvements (sidewalk enhancements, street trees, benches) and internal landscaped pedestrian paths to increase foot traffic between the hospital Campus, the surrounding community, and the Metro Station. Finally, the Project would implement transportation demand management (TDM) measures as required by the County, and would provide bicycle parking in accordance with LACC requirements. Therefore, the Project would promote a variety of travel

Table 4.H-2 (Continued)

Comparison of the Project to Applicable Policies of the SCAG 2008 Compass Growth Visioning (including Compass 2% Blueprint Strategy)

Goal/Policy	Analysis of Project Consistency
	choices (e.g., car, carpooling, vanpooling, mass transit, pedestrian, bicycle).
<p>Principle #2: Foster livability in all communities.</p>	<p>Consistent: The Project would increase employment from approximately 5,464 to approximately 7,494 at a site near multiple residential neighborhoods and the Carson Street Metro Transit Station. The Project would allow for continued operation of the Harbor-UCLA Medical Center, thereby maintaining existing jobs near existing housing and reducing the need for residents to travel outside local area for work and health care services. Finally, the Project would provide a mix of community-serving uses (e.g., hospital, outpatient facilities, ground floor retail or other limited commercial services, green areas, etc.) to the local community. Therefore, the Project would foster livability in the West Carson community and larger South Bay Planning Area.</p>
<p>Policy: Promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project would represent infill development and the redevelopment of an existing underutilized site, and together with the community-serving uses discussed above, would help revitalize the local West Carson community.</p>
<p>Policy: Promote developments that provide a mix of uses.</p>	<p>Consistent. The Project would provide a mix of uses, including hospital/inpatient, outpatient, medical office, administrative office, R&D, medical laboratory, retail, library, daycare, and outdoor green space uses.</p>
<p>Policy: Promote “people-scaled” pedestrian-friendly communities.</p>	<p>Consistent. The Master Plan would promote a “people-scaled” pedestrian-friendly community by: including a mix of community-serving uses (e.g., hospital, outpatient facilities, ground floor retail or other limited commercial services, green areas, landscaped setbacks, etc.) oriented towards a major thoroughfare (Carson Street); providing a clear, well organized, and signed internal pedestrian circulation system; providing frontage improvements (sidewalk enhancements, street trees, benches) and internal landscaped pedestrian paths to increase foot traffic within the hospital Campus, and between the hospital Campus, the surrounding community, and the Metro Station located 0.10 mile to the east; and providing bicycle parking in accordance with LACC requirements.</p>
<p>Policy: Ensure environmental justice regardless of race, ethnicity, or income class.</p>	<p>Consistent. The Project would provide a range of employment opportunities that would adhere to all applicable federal, State, and local regulations prohibiting discrimination in employment. In addition, the Project would not displace low-income people, and would not introduce industrial, airport, rail, landfill, or other uses to the West Carson community most often associated with substantial amounts of pollution, toxic air contaminants, odors, noise, or visual blight.</p>
<p>Principle #4: Promote sustainability for future generations.</p> <p>Policy: Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste.</p>	<p>Consistent. The Project would constitute infill commercial development along established transit corridors that would allow for nearby residents to find jobs, health care services, and goods and services in their immediate vicinity, thereby reducing vehicle miles travelled (VMT) and avoiding urban sprawl. Furthermore, per the current County policy requiring LEED Silver-level certification or the equivalent for any public facility over 10,000 square feet in floor area, the Project would be designed and constructed to achieve LEED Silver-level certification or its equivalent. Green building practices would also be incorporated into all building design, construction, and operation, and would be integrated with Campus infrastructure and both stormwater and wastewater treatment. A Waste Management Center would also be developed as part of the new Hospital Tower</p>

Table 4.H-2 (Continued)

Comparison of the Project to Applicable Policies of the SCAG 2008 Compass Growth Visioning (including Compass 2% Blueprint Strategy)

Goal/Policy	Analysis of Project Consistency
	where among other things, sorting of waste would occur for recycling.
<p>Policy: Utilize “green” development techniques.</p>	<p>Consistent. As discussed above, the Project is required to meet the standards for LEED® Silver-level certification or the equivalent in accordance with the County’s Green Building Program. Some key Project features intended to contribute to energy efficiency include high-efficiency fixtures and appliances; the use of drought-tolerant and water-efficient landscaping; water conservation measures including installation of low-flow fixtures and smart irrigation controls; and of stormwater retention and treatment onsite.</p>

Source: PCR Services Corporation, 2016.

(c) SCAG - 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy

The 2016 RTP/SCS provides a guiding vision for development in the region and a basis for planning infrastructure improvements. **Table 4.H-3, Comparison of the Project to Applicable Policies of the SCAG 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy**, evaluates the consistency of the Project with policies of SCAG’s 2016 RTP/SCS. As discussed therein, the Project would be consistent with applicable RTP/SCS goals and policies. The Project would encourage economic development by providing a mix of commercial uses on an infill site well served by an existing transportation network, including mass transit to provide an alternative to private automobiles. Further, the Project would enhance the pedestrian environment within the Project Site and along Carson Street, and improve pedestrian connectivity between the Project Site, the surrounding community, and the Carson Street Metro Transit Station (Silver Line). The Project would implement design features and mitigation measures to reduce air quality impacts, including the incorporation of energy-saving features (see Sections 4.B., Air Quality, and 4.E., Greenhouse Gas Emissions, of this Draft EIR). Active transportation, including pedestrian connections and close proximity to transit options, would encourage alternative transit modes and improve air quality. The Project would support energy efficiency through design and operation in accordance with LEED-Silver certification or its equivalent. Based on the analysis presented in Table 4.H-3, the Project would be consistent with applicable RTP/SCS policies. No significant impacts with respect to RTP/SCS policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur.

Table 4.H-3

Comparison of the Project to Applicable Policies of the SCAG 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy

Goal/Policy	Analysis of Project Consistency
<p>Goal: Align the plan investments and polices with improving regional economic development and competitiveness.</p>	<p>Consistent: The Project would enable Harbor-UCLA Medical Center to continue to provide health care services to the region, and to enhance these services. In addition, the Project would allow for the retention of the existing jobs at the Harbor-UCLA campus, and would provide new jobs (i.e., short-term construction jobs and long-term operation) in close proximity to existing housing. Finally, the project would represent infill development of an existing underutilized site, and increased urban density, that would take advantage of the existing</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies of the
SCAG 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy**

Goal/Policy	Analysis of Project Consistency
	transportation options in the area, including the Carson Street Metro Transit Station and Harbor Freeway, both located 0.10 mile to the east. Hence, the Project would increase regional economic development and competitiveness.
<p>Goal: Maximize mobility and accessibility for all people and goods in the region.</p>	<p>Consistent: The Project would represent infill development and increased density along established transportation corridors (with existing bus service) and within 0.10 miles of both a Carson Street Metro Transit Station and Harbor Freeway. The Project would allow for the continued provision of hospital and outpatient services, retention of existing campus jobs, and additional employment opportunities within the area, thereby reducing the need for residents to travel outside the area for health care and work. The Project would also represent walkable mixed use development by including a mix of community-serving uses oriented towards a major thoroughfare (Carson Street), providing a clear, well organized, and signed internal pedestrian circulation system, and providing frontage improvements along the bordering streets to increase foot traffic between the hospital Campus, the surrounding community, and the Metro Station. Therefore, the Project would improve mobility for all residents</p>
<p>Goal: Ensure travel safety and reliability for all people and goods in the region.</p>	<p>Consistent: The Project would represent infill development along established transportation routes and within 0.10 mile of the Harbor Freeway and the Carson Street Metro Transit Station, for safe and reliable access by hospital patients and employees. The internal circulation system and signage at Project driveways and within the Project Site would be improved, public and staff vehicular access to and within the Project Site would be separated, and a new public signalized public entrance to the Project Site would be provided from Carson Street, thereby increasing clarity and both vehicular and pedestrian access and safety. Further, the Project would incorporate County-required urban design standards along the transportation routes, and internal pedestrian walkways and landscaped setbacks, to maintain a safe and comfortable pedestrian environment and buffering between uses.</p>
<p>Goal: Preserve and ensure a sustainable regional transportation system.</p> <p>Goal: Maximize the productivity of our transportation system.</p>	<p>Consistent: The Project would represent infill development and increased urban density along established transportation routes (with existing bus service), and within close proximity to the Harbor Freeway and Carson Street Metro Transit Station, thereby taking advantage of existing vehicular and mass transit options. The Project would also allow for the continued provision of hospital and outpatient services, retention of existing campus jobs, and additional employment opportunities within the West Carson Community and greater South Bay Planning Area, thereby reducing the need for residents to travel outside the area for health care and work. The above would contribute to preserving the sustainability and maximizing the productivity of the regional transportation system.</p>
<p>Goal: Protect the environment and health for our residents by improving air quality and encouraging active transportation</p>	<p>Consistent: The Project would represent infill development and increased density along established transportation corridors (with existing bus service) and within 0.10 miles of both a Carson Street Metro Transit Station and Harbor Freeway. The Project would allow for the continued provision of hospital and</p>

Table 4.H-3 (Continued)

**Comparison of the Project to Applicable Policies of the
SCAG 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy**

Goal/Policy	Analysis of Project Consistency
(non-motorized) transportation, such as bicycling and walking.	outpatient services, retention of existing campus jobs, and additional employment opportunities within the area, thereby reducing the need for residents to travel outside the area for health care and work. The Project would also represent walkable mixed use development by including a mix of community-serving uses oriented towards Carson Street, providing a clear, well organized, and signed internal pedestrian circulation system, and providing frontage improvements along the bordering streets to increase foot traffic between the hospital Campus, the surrounding community, and the Metro Station. Lastly, the Project would implement TDM measures as required by the County, and would provide bicycle parking in accordance with LACC requirements. The above would have the effect of encouraging alternative modes of transportation, and reducing per capita VMT and per capita air emissions, and thus would be protective of the environment and the health of local residents.
Goal: Actively encourage and create incentives for energy efficiency, where possible.	Consistent: In addition the energy efficiency to be realized associated with the above-discussed reduction in per capita VMT, the Project would: (1) be designed and constructed to achieve LEED Silver-level certification or its equivalent; and (2) incorporate Green building design and operation in all buildings, integrated with Campus infrastructure and both stormwater and wastewater treatment.
Goal: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent: As indicated previously, the Project would represent infill development, the intensification of land uses within close proximity to mass transit, and the development of job-generating uses and provision of health care services within close proximity to housing. As also discussed previously, the Project would include pedestrian improvements within the Project Site and along the streets bordering the Project Site, implementing TDM measures required by the County, and providing bicycle parking in accordance with LACC requirements. These would all have the effect of facilitating transit and non-motorized transportation.
Goal: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent: This goal pertains to security provided by regional security agencies. Rather than adversely affecting the ability of the security agencies to perform their emergency response duties, the Project would allow these agencies to retain their response capacity by allowing the hospital to continue to operate, and would increase the response capacity of these agencies by increasing the inpatient and outpatient capacity of the hospital campus. In addition, the Project would help support improved system monitoring, rapid recovery planning, and the ability of security agencies to coordinate with one another by participating in area-wide emergency response planning and by generating increased property tax and other public revenues for use in emergency planning.

Source: PCR Services Corporation, 2016.

(d) County of Los Angeles - 2035 General Plan Update

Table 4.H-4, *Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update*, evaluates the consistency of the Project with applicable policies of the County’s 2035 General Plan Update. As indicated, the Project would be consistent with applicable policies of General Plan Update as the Project would: be compatible with the existing adjacent off-site land uses; incorporate sustainable design; facilitate multiple modes of transportation (including alternative modes); provided interconnected and safe

pedestrian and bicycle circulation; provide required green space and landscaped setbacks; result in less than significant impacts to biological, aesthetic and cultural resources after mitigation; result in less than significant seismic/geotechnical and noise impacts after mitigation; be developed with adequate public service and water, wastewater, and solid waste disposal capacity to serve the Project; and foster regional economic development.

Table 4.H-4

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
Land Use Element	
Goal LU 6: Compatible land uses that complement neighborhood character and the natural environment.	
Policy LU 6.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques.	Consistent: The Project would alter the existing visual appearance of the Project Site through the development of a denser set of buildings, in some cases with greater heights, than currently exist on the campus. However, the Project would continue the existing commercial (e.g., hospital/inpatient, outpatient, medical clinic/R&D, surface and structured parking) use of the campus which has been in such use for several decades rather than introduce a new use to the Project Site. Furthermore, the Project Site is located within a fully urbanized setting with commercial uses to the north and east, is separated from off-site land uses by major thoroughfares, and in the west is also separated from off-site land uses by the abandoned railroad right-of-way along the west side of Normandie Avenue. Also, the Project would provide landscaping and street trees along the Project Site street frontages where in some areas such landscaping and trees are lacking, and Project buildings would be designed in compliance with unifying design guidelines which would improve the appearance of on-site development. In addition, the area as a whole, which is located within the 110 Freeway/Carson Station TOD, is undergoing a transition to greater urbanization, characterized in part by the recent development of higher density multi-family uses to the west and the construction of the Carson Street/Normandie Avenue Mall to the north. For all these reasons, while the densification of land uses at the Project Site would be noticeable from adjacent off-site land uses, including from the residential neighborhoods to the south east and west (commercial uses along the north side of Carson Street intervene between the Project Site and the residential neighborhood to the north), the Project would not result in significant land use incompatibilities with adjacent off-site land uses.
Policy LU 6.7: Protect rural communities from the encroachment of incompatible development.	Consistent: The Project would include infill development within a fully urbanized setting. Therefore, rural communities would be unaffected, and in fact the Project would contribute to a reduction in the potential for urban sprawl by providing health care services and new jobs in proximity to existing housing.
Policy LU 6.8: Encourage land uses and developments that are compatible with the natural environment and landscape.	Consistent: The Project would include infill development on an already fully developed site and within a fully urbanized setting, and would not include development adjacent to or within the proximity of natural areas or natural features. Furthermore, the Project would implement a Landscape Master Plan that would provide landscaped buffers along the campus perimeter, street trees, and landscaped promenades, trails, courtyards and plazas on the Project Site where little such landscape features currently exist.
Policy LU 6.9: Encourage development in rural areas that is	Consistent: The Project would include infill development within a fully urbanized setting, on a fully developed site already served by public services and

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
compatible with rural community character, preserves open space, conserves agricultural land, and promotes efficiencies in services and infrastructure.	infrastructure. Hence, the Project would not displace open space or agricultural land, and would not result in efficiencies in services and infrastructure. Concerning encouraging development in rural areas that is compatible with rural community character, see the analysis of Project consistency with Policy LU 6.8 above.
Goal LU 9: Well-designed and healthy places that support a diversity of built environments.	
Policy LU 9.2: Design development adjacent to natural features in a sensitive manner to complement the natural environment.	Consistent: See the analysis of Project consistency with Policy LU 6.8 above.
Policy LU 9.3: Consider the built environment of the surrounding area in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.	Consistent: The built environment surrounding the Project Site is currently urbanized and located within the 110 Freeway/Carson Station TOD. Densification of the area is evident in recently constructed retail malls and multi-family housing in proximity to the Project Site. Because the Project Site is already developed and contains a high-rise element (existing 8-story hospital tower), and is located within an existing urbanized area, it would be consistent with the character of the existing on-site and surrounding off-site built environment. Also, the Project Site is an approximately one-half-mile-long block, abutting three major roadways (Carson Street, and Normandie and Vermont Avenues) and is self-contained with respect to building design and interface with on-site structures. Therefore, the built environment of the Project Site is already somewhat distinct from that of the surrounding area. Finally, the Project would include proposed Design Guidelines which require that individual buildings be compatible with each other in relation to massing, materials, design, building orientation, detailing, and other features, thereby providing a more cohesive architectural style that reflect appropriate features such as massing, materials, color, detailing and ornamentation..
Policy LU 9.12: Discourage gated entry subdivisions (“gated communities”) to improve neighborhood access and circulation, improve emergency access, and encourage social cohesion.	Consistent. The Project would not contain residential use, either subdivision or a gated community. As indicated in Figure 2-8, Vehicular Circulation Plan, in Chapter 2.0, <i>Project Description</i> , of this Draft EIR, the Project’s vehicular circulation plan would: separate public and staff site access, internal circulation and parking to better pare patients, visitors and staff with their on-site destinations; provide a comprehensive signage and wayfinding plan to aid patients, visitors and staff in navigating the Campus; include a new signalized public entrance on Carson Street and a new unsignalized staff entrance on Vermont Avenue; construct sidewalk connections to the public transit system and sidewalks along primary internal routes to aid in pedestrian circulation; and providing internal emergency access lanes per LACC standards. These measures would have the effect of improving vehicular, pedestrian and emergency access to and within the Project Site.
Goal LU 10: Development that utilize sustainable design techniques.	
Policy LU 10.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.	Consistent. The Project would constitute infill development along established transit corridors that would allow for nearby residents to find jobs, health care services, and goods and services in their immediate vicinity, thereby reducing vehicle miles travelled (VMT) and fuel consumption. The Project would also employ sustainable energy practices, including being designed and constructed to achieve LEED Silver-level certification or its equivalent, and incorporating green building practices in building design and infrastructure systems (including

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
	stormwater/wastewater treatment). Also, while the Project does not specifically propose the orientation of buildings to maximize passive and active solar design techniques, in order to achieve the proposed LEED Silver-level certification, the Project would be required to incorporate energy-saving heating and cooling which could include passive solar techniques and/or active solar technologies.
<p>Policy LU 10.2: Support the design of developments that provide substantial tree canopy cover, and utilize light colored paving materials and reflective roofing materials to reduce the urban heat island effect.</p>	<p>Consistent. The Project does not specifically propose the provision of light colored paving materials and reflective roofing materials to reduce the urban heat island effect. However, in order to achieve the proposed LEED Silver-level certification, the Project would be required to incorporate heat island reduction measures which could potentially include the use of light colored paving and/or reflective roofing materials. Furthermore, as indicated in Figure 2-10, Landscape Master Plan, in Chapter 2.0, <i>Project Description</i>, of this Draft EIR, unlike existing on-site conditions, the Project would include extensive canopy tree plantings along all four Project Site Street frontages, along internal streets, and within proposed on-site plazas and open space areas, which would reduce the urban heat island effect.</p>
<p>Policy LU 10.3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.</p>	<p>Consistent. The Project does not specifically propose the orientation of buildings to maximize passive and active solar design techniques. However, in order to achieve the proposed LEED Silver-level certification, the Project would be required to incorporate energy-saving heating and cooling, which could include building orientation to maximize solar lighting and heating/cooling.</p>
<p>Mobility Element</p>	
<p>Goal M 1: Street designs that incorporate the needs of all users.</p>	
<p>Policy M 1.1: Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, roads and streets.</p>	<p>Consistent. The Project would provide frontage improvements (sidewalk enhancements, street trees, benches) along the bordering streets, and an internal vehicular and pedestrian circulation system (Figures 2-8 and 2-9 in Chapter 2.0, <i>Project Description</i>, of this Draft EIR), in accordance with LACC requirements and County urban design standards to increase vehicular, pedestrian, and bicycle circulation within the Project Site and between the Project Site and the surrounding community. Furthermore, Project driveways to and within the Project Site would be improved, public and staff vehicular access to and within the Project Site would be separated, and a new public signalized public entrance to the Project Site would be provided from Carson Street, to increase clarity and both vehicular and pedestrian access and safety. Also, bicycle parking would be provided consistent with LACC requirements, and all new buildings, internal streets and sidewalks, and parking would be ADA-compliant. Therefore, the Project would improve mobility and safety for all users.</p>
<p>Goal M 2: Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.</p>	
<p>Policy M 2.1: Design streets that accommodate pedestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban,</p>	<p>Consistent. Please see the analysis of Project consistency with Policy M 1.1 above. Furthermore, the Master Plan would create an interconnected and safe pedestrian- and bicycle-friendly environment that integrates with the surrounding community by: including a mix of community-serving uses (e.g., hospital, outpatient facilities, ground floor retail, green areas, etc.) oriented towards a major thoroughfare (Carson Street); providing a clear, well organized,</p>

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
suburban, and rural communities.	and signed internal pedestrian circulation system (Figure 2-9 in Chapter 2.0, <i>Project Description</i> , of this Draft EIR); providing frontage improvements along the bordering streets and internal landscaped pedestrian paths, and providing bicycle parking consistent with LACC requirements. These improvements would increase pedestrian and bicycle traffic within the hospital Campus, and between the hospital Campus, the surrounding community, and the Metro Station located 0.10 mile to the east.
Policy M 2.5: Ensure a comfortable bicycling environment.	Consistent. According to the Los Angeles County 2012 Bicycle Master Plan, a sub-element of the County’s General Plan Transportation Element, there are no existing designated bikeways along the four streets bordering the Project Site, although a Class II bike lane is planned along Vermont Avenue and a Class III bike route is planned along 220 th Street. ¹¹ The Project would not alter the Vermont Avenue or 220 th Street rights-of-way, other than to provide frontage improvements (e.g., sidewalk enhancements, street trees, benches) along these streets, and thus would not interfere with the future development of these bikeways. Furthermore, the Project would provide on-site bicycle parking consistent with LACC requirements, and would include an on-site vehicular and pedestrian circulation system (Figures 2-9 and 2-10 in Chapter 2.0, <i>Project Description</i> , of this Draft EIR) that complies with LACC requirements and County Urban Design standards and could be used by bicycle traffic. Therefore, the Project would be expected to improve the local bicycling environment.
Policy M 2.9: Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.	Consistent. The Project would implement a Landscape Master Plan (Figure 2-10 in Chapter 2.0, <i>Project Description</i> , of this Draft EIR) that includes landscaped buffers along the campus perimeter, street trees, and on-site landscaped promenades, trails, courtyards, and plazas. This includes a central garden spine to extend through the Project Site from Carson Street to 220 th Street.
Conservation and Natural Resources Element	
Goal C/NR 1: Open space areas that meet the diverse needs of County of Los Angeles.	
Policy C/NR 1.1: Implement programs and policies that enforce the responsible stewardship and preservation of dedicated open space areas.	Consistent. There is no existing dedicated open space or natural areas on the Project Site, nor does the County have open space dedication requirements applicable to the proposed Project. However, the Project would provide publically-owned on-site open space in the form of landscaped areas (see Figure 2-10, Landscape Master Plan, in Chapter 2.0, <i>Project Description</i> , of this Draft EIR). This includes landscaped buffers along the campus perimeter, and on-landscape promenades, trails, courtyards, and plazas, including a central garden spine to extend through the Project Site from Carson Street to 220 th Street.
Policy C/NR 1.6: Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, woodlands, grasslands, and/or	Consistent. The Project Site is fully developed and located within a fully urbanized setting. As indicated in Section IV of the Initial Study prepared for the Project (Appendix A-1 of this Draft EIR), no streams woodlands, grasslands, natural watershed areas, or sensitive biological resources habitat occur on or immediately adjacent to the Project Site, nor does the Project Site serve as a

¹¹ County of Los Angeles 2012 Bicycle Master Plan, Figure 3-4 and Table 3-33, adopted March 13, 2012. dpw.lacounty.gov/pda/bike/masterplan.cfm. Accessed by PCR December 29, 2015.

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
offer linkages that enhance wildlife movements and genetic diversity.	wildlife movement corridor. Furthermore, the Project Site is not located within a County-designated open space area or Significant Ecological Area (SEA). ¹² Therefore, the Project would not impact such features/areas or the ability of the County to acquire or prioritize the acquisition of such features/areas.
Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands and SEAs.	
Policy C/NR 3.2: Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.	Consistent. Please see analysis of Project consistency with Policy C/NR 1.6 above.
Goal C/NR 4: Preserved and restored oak woodlands that are conserved in perpetuity with no net loss of existing woodlands.	
Policy C/NR 4.1: Conserve and sustainably manage oak woodlands.	Consistent. The Project Site is fully developed and is located within a fully urbanized area. As indicated in Section IV of the Initial Study prepared for the Project (Appendix A-1 of this Draft EIR), no oak woodland and no oak trees protected under the County’s Oak Tree Ordinance (LACC Chapter 22.56 – Part 16) occur on the Project Site. Therefore, the Project would not interfere with the ability of the County to conserve and sustainably manage oak woodlands.
Goal C/NR 13: Protected visual and scenic resources.	
Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.	Consistent. The Project Site occurs on a valley floor rather than a ridgeline. Therefore, the Project would not affect a ridgeline or the ability of the County to project ridgelines from incompatible development that diminishes their scenic value.
Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.	Consistent. The Project Site is not located within a County-designated Hillside Management Area (HMA). ¹³ Therefore, the Project would not affect the natural or scenic character of an HMA, and would not expose persons or property to HMA-related hazards.
Goal C/NR 14: Protected historic, cultural, and paleontological resources.	
Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.	Consistent. As indicated in Section V of the Initial Study prepared for the Project (Appendix A-1 of this Draft EIR), which is based on an Historic Resources Report prepared of the Project Site, no existing on-site buildings are individually eligible for listing in the National Register or California, nor is the Site as a whole eligible for listing in these registers as an historic district. In addition, the analysis concluded that the Project Site as a whole is not historically significant despite its association with World War II military history in Los Angeles, a less than

¹² County of Los Angeles, County of Los Angeles General Plan Update (2035), Figure 9.1, Open Space Resources Policy Map, and Figure 9.3, Significant Ecological Areas. Adopted October 6, 2015.

¹³ Ibid, Figure 9.8, Hillside Management Areas.

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
	<p>significant impact on historic resources would occur. Further discussion of historic resources is provided in Section 6.0, Other CEQA Considerations, of this Draft EIR.</p> <p>Also, as indicated in Section V of the Initial Study, while it is likely that any archaeological resources, paleontological resources, and/or human remains that may have been present on Site have been disturbed or removed, previously undiscovered such materials may still exist at the property and could potentially be disturbed by Project construction activities. However, the analysis determined that, with implementation of standard archaeological and paleontological mitigation requiring the handling, analysis and ultimate disposition of any finds in accordance with California Public Resources Code requirements, Project impacts on archaeological resources, paleontological resources, and human remains would be less than significant.</p>
<p>Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).</p>	<p>Consistent. Please see the analysis of Project consistency with Policy C/NR 14.1 above.</p>
<p>Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.</p>	<p>Consistent. Please see the analysis of Project consistency with Policy C/NR 14.1 above.</p>
<p>Parks and Recreation Element</p>	
<p>Goal P/R 4: Improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages.</p>	
<p>Policy P/R 4.4: Maintain and design multi-purpose trails in ways that minimize circulation conflicts among trail users.</p>	<p>Consistent. The Project Site is not currently bisected by any multi-use trails, nor are any multi-use trails designated on the Project Site by the County’s General Plan Update. Therefore, the Project is under no obligation to provide a multi-purpose trail across the Project Site. Still, the Project would include a central garden spine extending through the Project Site from Carson Street to 220th Street that would, as indicated Figure 2-9, Pedestrian Circulation, in Chapter 2.0, <i>Project Description</i>, of this Draft EIR, include pedestrian linkages.</p>

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
Noise Element	
Goal N 1: The reduction of excessive noise impacts.	
<p>Policy N 1.2: Reduce exposure to noise impacts by promoting land use compatibility.</p>	<p>Consistent. The Project Site is already the site of an operating Medical Campus, and already generates operational noise (traffic, stationary source, and activity noise) consistent with such a campus. The Project Site is also separated from existing off-site sensitive noise receptors (e.g., residential uses) by arterial streets which are already a source of traffic noise. Therefore, as indicated in Section 4.I., <i>Noise</i>, in this Draft EIR, while the Project would intensify the existing medical commercial use of the Project Site, and result in an incremental increase in operational noise, the operational noise impacts of the Project would be less than significant with implementation of the recommended mitigation.</p> <p>With respect to construction noise, Project construction activities would result in significant unavoidable construction noise as indicated in Section 4.I. However, as further indicated, such noise impacts would only occur associated with construction activities in portions of the Project Site closest to existing off-site sensitive noise receptors, and would be temporary, lasting only as long as the construction activities in the subject portion of the Project Site occur.</p>
Safety Element	
Goal S 1: An effective regulatory system that prevents or minimizes personal injury, loss of life and property damage due to seismic and geotechnical hazards.	
<p>Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.</p>	<p>Consistent. As indicated in Section VII of the Initial Study prepared for the Project (provided in Appendix A-1 of this Draft EIR), the Project Site is not located in a Seismic Hazard Zone or Alquist-Priolo Earthquake Fault Zone, and no known faults bisect the Project Site. Therefore, the Project would not be subjected to fault rupture, and no mitigation is required.</p>
<p>Policy S 1.3: Require developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards.</p>	<p>Consistent. The Project Site is not located within a County-designated Hillside Management Area (HMA).¹⁴ Therefore, the Project would not be subjected to HMA-related geotechnical hazards, and no mitigation is required.</p>
Goal S 3: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.	
<p>Policy S 3.1: Discourage development in VHFHSZs, particularly in areas with significant biological resources.</p>	<p>Consistent. As indicated in Section IX of the Initial Study prepared for the Project (Appendix A-1 of this Draft EIR), the Project Site is not located within a Fire Hazard Severity Zone (FHSZ). Therefore, the Project would not be subjected to wildland fires or other potential very high fire risks, and no mitigation is required.</p>
<p>Policy S 3.4: Reduce the risk of wildland fire hazards through the use of regulations and performance</p>	<p>Consistent. Please see analysis of Project consistency with Policy S 3.1 above.</p>

¹⁴ County of Los Angeles, County of Los Angeles General Plan Update (2035), Figure 9.8, Hillside Management Areas. Adopted October 6, 2015.

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
standards, such as fire resistant building materials and vegetation.	
Public Services and Facilities Element	
Goal PS/F 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.	
Policy PS/F 1.1: Discourage development in areas without adequate public services and facilities.	Consistent. The Project would represent infill development within an existing urbanized area. Furthermore, the Project Site is already fully developed with similar hospital and medical uses, and already fully served by existing public services (police, fire, schools, parks, libraries) and existing public utilities (water, wastewater, electricity, natural gas, etc.). Finally, as indicated in Sections XV and XVIII of the Initial Study prepared for the Project (provided in Appendix A-1 of this Draft EIR) and Sections 4.K., Public Services, and 4.M., Utilities and Service Systems, of this Draft EIR, adequate public services and public utilities are available to serve the Project with implementation of the recommended mitigation.
Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.	Consistent. Please see analysis of Project consistency with Policy PS/F 1.1 above. Furthermore, during the development review and permitting stage for each phase of Project development, the applicant would coordinate with the County of Los Angeles County Department of Public Works (LACDPW) and other applicable County departments and service/utility providers, as required by the LACC, to ensure that adequate public service and utility infrastructure is in place to serve the subject development phase.
Goal PS/F 2: Increased water conservation efforts.	
Policy PS/F 2.1: Implement water conservation measures, such as drought tolerant landscaping and restrictions on water used for landscaping.	Consistent. As discussed in Section 4.M.1, <i>Water Supply</i> , of this Draft EIR: (1) the Project would comply with applicable provisions of the CALGreen code, Titles 20 and 24 of the California Administrative Code, and LEED to increase water efficiency and reduce water demand through the installation of drought-tolerant landscaping, low-water consumption irrigation systems, and water efficient plumbing fixtures; and (2) adequate water supplies are available to serve the Project.
Goal PS/F 5: Adequate disposal capacity and minimal waste and pollution.	
Policy PS/F 5.5: Reduce the County's waste stream by minimizing waste generation and enhancing diversion.	Consistent. As discussed in Section 4.M.3, <i>Solid Waste</i> , of this Draft EIR: (1) the Project would comply with applicable provisions of the CALGreen Code, LEED, and LACC with respect to solid waste reduction, diversion and recycling; (2) adequate landfill capacity is available to serve the Project; and (3) the Project would not impede the ability of the County to meet its AB 939 waste diversion requirements.
Policy PS/F 5.6: Encourage the use and procurement of recyclable and biodegradable materials.	Consistent. As discussed in Section 4.M.3, <i>Solid Waste</i> , of this Draft EIR, the Project would use recyclable and biodegradable materials where appropriate and economically feasible. Materials may include, but are not limited to, gypsum board, insulation, steel, ceramic tile, countertops, trim, and carpet/carpet padding.
Policy PS/F 5.7: Encourage the recycling of construction and demolition debris generated by	Consistent. As discussed in Section 4.M.3, <i>Solid Waste</i> , of this Draft EIR, the Project would comply with applicable provisions of the CALGreen code to reduce resource consumption, including recycling, reusing, and/or diverting 70 percent

Table 4.H-4 (Continued)

Comparison of the Project to Applicable Policies of the County of Los Angeles 2035 General Plan Update

Goal/Policy	Analysis of Project Consistency
public and private projects.	of non-hazardous construction waste.
Policy PS/F 5.9: Encourage the availability of trash and recyclables containers in new developments, public streets, and large venues.	Consistent. As discussed in Section 4.M.3, Solid Waste, of this Draft EIR, the Project would comply with applicable provisions of the CALGreen code to reduce resource consumption by ensuring that trash and recyclable containers are provided to future residents, in accordance with County requirements. Furthermore, the Project would include a Waste Management Center in the New Hospital Tower where hazardous and non-hazardous solid waste would be separated, and where the non-hazardous solid waste would be sorted for recycling.
Goal PS/F 7: A County with adequate educational facilities.	
Policy PS/F 7.2: Proactively work with school facilities and education providers to coordinate land use and facilities planning.	Consistent. As indicated in Section 4.K.4, <i>Schools</i> , of this Draft EIR, the Project would represent infill development within an existing urbanized area, is already fully developed with similar hospital and medical uses, and already generates a demand for Los Angeles Unified School District (LAUSD) school facilities and services, such that the densification of uses at the Project Site under the Project would result in a small incremental increase in demand for. As further indicated in Section 4.K.4, with the payment of the applicable prevailing LAUSD school impact fees, adequate school facilities would be available to serve the Project.
Goal PS/F 8: A comprehensive public library system.	
Policy PS/F 8.2: Support library mitigation fees that adequately address the impacts of new development.	Consistent. As indicated in Section 4.K.5, <i>Libraries</i> , of this Draft EIR, the Project would represent infill development within an existing urbanized area, is already fully developed with similar hospital and medical uses, and already generates a demand for library facilities and services from the County of Los Angeles Public Library (LACPL), such that the densification of uses at the Project Site under the Project would result in a small incremental increase in demand for libraries. As further indicated in Section 4.K.5, with the payment of the applicable prevailing LACPL library impact mitigation fee, adequate library facilities would be available to serve the Project.
Economic Development Element	
Goal ED 1: An economic base and fiscal structures that attract and retain valuable industries and businesses	Consistent. The Project would enable Harbor-UCLA to continue to operate a hospital at the Project Site, which would otherwise require closure in response to seismic safety regulations adopted in California after the Northridge Earthquake, and would also allow the hospital and other existing medical uses at the Project Site to expand operations. Thus, the Project would help attract and retain a valuable local-serving industry and associated local jobs, increase local job opportunities, and foster economic development and growth, in the West Carson community and greater South Bay Planning Area.
Goal ED 2: Land use practices and regulations that foster economic development and growth.	Consistent. Please see the analysis of Project consistency with Goal ED 1.

Source: PCR Services Corporation, 2016.

(e) County of Los Angeles - General Plan Land Use Designations

(i) Permitted Land Uses

As indicated in Figure 4.H-2, the Project Site is designated “P” (Public and Semi-Public) by the County’s General Plan Update. The “P” GPLU designation permits a broad range of public and semi-public facilities and community-serving uses, including public buildings and campuses, schools, hospitals, cemeteries, fairgrounds, airports and other major transportation facilities, landfills, solid and liquid waste disposal sites, multiple use storm water treatment facilities, and major. Also, in the event that the public or semi-public use of mapped facilities is terminated, alternative uses that are compatible with the surrounding development, in keeping with community character, are permitted.¹⁵

As indicated in Table 2-1, Harbor-UCLA Master Plan Project Existing and Proposed Land Use Summary, and in Figure 2-6, Harbor-UCLA Medical Campus Master Plan Site Plan, in Chapter 2.0, Project Description, of this Draft EIR, the Project would include a mix of uses, including: hospital/in-patient, medical office/outpatient, administrative office, retail, library, day care, biomedical R&D, warehouse/storage, and utility/infrastructure uses (including surface parking lots and parking structures). These use types, which already occur on the Project Site, are permitted under the “P” GPLU designation. Therefore, the Project would be consistent with the GPLU designation of the Project Site.

(ii) Floor Area Ratio

The maximum FAR permitted under the “P” GPLU designation is 3:1.¹⁶ Because the Campus-wide FAR under the Project would be 0.78:1, the Project FAR would be well within the maximum FAR permitted under the “P” GPLU designation of the Project Site.

(f) County of Los Angeles - Planning and Zoning Code (LACC Title 22)

(i) Permitted Land Uses

As indicated in Figure 4.H-3, the Project Site is zoned C-3 (Unlimited Commercial) by the LACC. The C-3 zone permits a broad range of commercial uses, including but not limited to offices, universities/colleges, medical clinics, medical research/laboratories, retail stores, and utility/infrastructure uses (LACC §22.28.180), as well as hospitals and helistops.

As discussed above, the Project would include a mix of uses, including: hospital/in-patient, medical office/outpatient, administrative office, retail, library, day care, biomedical R&D, warehouse/storage, and utility/infrastructure uses (including surface parking lots and parking structures). These use types are either permitted outright by the C-3 zoning or would be already permitted. Therefore, the Project would be consistent with the zoning of the Project Site.

¹⁵ *Ibid*, Table 6.2

¹⁶ *County of Los Angeles, County of Los Angeles General Plan Update (2035), Chapter 6: Land Use Element, Table 6.2, Land Use Designations. Adopted October 6, 2015.*

(ii) Floor Area Ratio

The maximum FAR in the C-3 zone is 13:1 (LACC §22.52.050). Because the Campus-wide FAR under the Project would be 0.78:1, the Project FAR would be well within the maximum FAR permitted under the C-3 zoning of the Project Site.

(iii) Building Height

The maximum building height in the C-3 zone is up to 13 times the buildable area of the Medical Center Campus (per LACC §22.52.050). In other words, there is no height restriction as long as the development intensity on the site does not exceed the limits of the C-3 zone. Because the Campus-wide FAR under the Project would be only 0.78:1, Project building heights (which would reach a maximum of eight floors) would be well within the maximum permitted under the C-3 Zoning of the Project Site.

(2) Land Use Compatibility

Threshold LU-2: Would the Project be incompatible with existing adjacent off-site land uses?

Impact Statement LU-2: *The Project would be compatible with existing adjacent off-site land uses because the nature (type, scale, height, location) of the existing on-site land uses would not substantially change under the Project, nor would the character of the area as perceived by the existing adjacent off-site land uses. Therefore, land use compatibility impacts would be less than significant.*

The Project would alter the existing visual appearance of the Project Site through the development of a denser set of buildings, in some cases with greater heights, than currently exist on the campus. However, the Project would continue the existing commercial (e.g., hospital/inpatient, outpatient, medical clinic/R&D, surface and structured parking) use of the Campus which has been in such use for several decades rather than introduce new use types to the Project Site. Furthermore, as indicated in Figure 4.H-1, the Project Site is located within a fully urbanized setting with commercial uses to the north and east and primarily residential uses to the south and west, is separated from off-site land uses by major thoroughfares, and in the west is also separated from off-site land uses by the abandoned railroad right-of-way along the west side of Normandie Avenue. Also, the Project would provide landscaping and street trees along the Project Site street frontages where in some areas such landscaping and trees are lacking, and Project buildings would be designed in compliance with unifying design guidelines which would improve the appearance of on-site development therefore improving the visual appearance of the Project Site. In addition, the area as a whole, which is located within the 110 Freeway/Carson Station TOD, is undergoing a transition to greater urbanization, characterized in part by the recent development of higher density multi-family uses to the west and the construction of the Carson Street/Normandie Avenue Mall to the north. For all these reasons, while the densification of land uses at the Project Site would be noticeable from adjacent off-site land uses, including from the residential neighborhoods to the south east and west (commercial uses along the north side of Carson Street intervene between the Project Site and the residential neighborhood to the north), the Project would result in less than significant land use incompatibilities with adjacent off-site land uses.

e. Cumulative Impacts

Chapter 3.0, *General Description of Environmental Setting*, provides a list of projects that are planned or are under construction in the Project area. These projects are summarized in **Table 3.1, Related Projects List**, and mapped on **Figure 3-1, Related Projects Map**. As shown, 17 related projects occur within an

approximately two-mile radius of the Project Site, including four in the unincorporated West Carson Community, ten in the City of Carson, and three projects in the City of Los Angeles. These related projects combined include approximately 1,200 residential units and 158,000 square feet of non-residential land uses (e.g., retail, office, medical, and car wash).

As discussed in Subsection 4.H.2, *Environmental Setting*, the 72-acre Harbor-UCLA Campus is located in the unincorporated Community of West Carson on a flat urbanized site bordered by four arterial streets and surrounded on all sides by urban development. The City of Los Angeles lies immediately west of the Project Site, across Normandie Avenue, while the City of Carson lies one block east of the Project Site, across the Harbor Freeway located approximately 0.1 miles to the east. As discussed in Subsection 4.H.3.d, *Environmental Impacts*, the Project would represent infill development on an already urbanized site that would constitute a densification and slight increase in the height of the existing on-site medical uses, but that: (1) would be consistent with adopted regional and local land use plans, including the existing County GPLU designation and zoning of the Project Site; and (2) would result in less than significant land use incompatibilities with the existing adjacent off-site land uses.

Related projects are subject to CEQA review and review by County regulatory agencies. Most notably, related projects seeking increases in permitted densities and buildings seeking higher densities than those permitted by the underlying zoning per the LACC are subject to review by the Department of Regional Planning and other County departments for consistency with plan provisions. Projects can only be approved if found to be consistent with adopted land use plans and zoning. Given this, and given that the Project would be consistent with the adopted land use plans and zoning, cumulative impacts regarding consistency with the land use regulatory framework would be less than significant.

With respect to cumulative land use incompatibilities, such incompatibilities may occur when one or more related projects are close enough to a proposed project for the occupants of other nearby land uses to be able to experience substantive land use (height, scale, character), aesthetics (views, light, shading), air, and/or noise impacts from both one or more of the related projects AND the proposed project. In the current case, none of the related projects are close enough to the Project Site to add substantively to the Project's less than significant land use incompatibilities (the closest related project is Related Project #2, a 19-unit condominium project located at 1028 W 223rd Street, approximately ¼-mile (1,250 feet) south of the Project Site). Therefore, cumulative impacts regarding land use incompatibilities would be less than significant.

For evaluation of the cumulative land use impacts of the Project pertaining to air quality, see Sections 4.B., *Air Quality*, and 4.E., *Greenhouse Gas Emissions*, of this Draft EIR. For evaluation of the cumulative land use impacts of the Project pertaining to population/housing and transportation/parking, see Sections 4.J., *Population and Housing*, and 4.L., *Transportation and Traffic*, respectively, of this Draft EIR.

4. MITIGATION MEASURES

The land use impacts of the Project would be less than significant. Therefore, no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The land use impacts of the Project would be less than significant.