

**MLK TRANSITIONAL-AGE-YOUTH DROP-IN  
CENTER TIER II PROJECT**

**Martin Luther King, Jr. Medical Center Campus  
Redevelopment 6th Addendum to the Final  
Environmental Impact Report**

**SCH No. 2010031040**

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### Attachment

A – Technical Memorandum - Traffic

# 1. INTRODUCTION

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## A. PURPOSE OF THIS ADDENDUM

The purpose of this 6<sup>th</sup> Addendum to the 2011 Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment Final Environmental Impact Report (2011 FEIR) is to evaluate the environmental effects associated with the construction and operation of the currently Proposed Project. The currently Proposed Project is the replacement of the approximately 6,000 square foot Oasis Clinic with an approximately 9,345 square foot building to house the Transitional-Age-Youth (TAY) Drop-In Center.

The MLK Medical Center Campus Redevelopment Project (MLK Project) encompasses all activities related to the medical center. While the existing Oasis Clinic (the proposed location of the TAY Drop-In Center) is located north of the MLK Medical Center Main Campus (Main Campus or MLK Campus), the 2011 FEIR indicates that, “[t]he Hub Clinic and the Oasis Clinic (new) buildings are located north of the existing 38-acre campus but are considered part of the existing campus structures and operations.”<sup>1</sup>

The 1<sup>st</sup> Addendum to the 2011 FEIR addressed the effects of the East Campus Parking Structure, the 2<sup>nd</sup> Addendum addressed the effects of the proposed Child Care Center in the Claude Hudson Auditorium, the 3<sup>rd</sup> Addendum addressed impacts of a 52,000 square foot medical office building at the northeast corner of the MLK Campus, the 4<sup>th</sup> Addendum addressed impacts of the Behavioral Health Center and the associated renovation of the original Multi-Service Ambulatory Care Center (MACC) as well as demolition of the Hawkins Building, the 5<sup>th</sup> Addendum addressed the Child and Family Wellbeing Center, a replacement AIDS Project Los Angeles (APLA) building and a 600-space North Parking Structure (now proposed to be approximately 300 spaces). (Further details concerning these prior documents are provided on the following pages.)

On October 11, 2011, the County of Los Angeles certified the 2011 FEIR, approved the Tier I project (Tier I MLK Project) and conceptually approved the Tier II MLK Medical Center Campus Redevelopment Project (Tier II MLK Project). The 2011 FEIR analyzed an envelope of potential development on the MLK Campus (the development envelope is comprised of: maximum square feet of occupied space, maximum demolition of existing structures, maximum height of new structures, minimum setbacks, depth of excavation, and assumptions with respect to daily construction activity). The maximum square footage at build out for Tier II was identified as 1,814,696 square feet, an increase of 1,476,010 compared to existing conditions identified

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<sup>1</sup> 2011 FEIR, page 2-3, footnote 7. The 2011 FEIR identifies the Oasis Clinic as 1,850 square feet in error. DPW has confirmed that the building is approximately 6,000 square feet. The 2011 FEIR evaluates impacts based on total impacts with the project in the future compared to existing conditions. By undercounting existing floor area, the 2011 FEIR incrementally underestimates existing impacts and therefore incrementally overestimates the net change in impacts due to the project. This results in a conservative analysis.

in the 2011 FEIR. Parking area is not included in developed area as it is not occupied building area and does not generate trips. The 2011 FEIR did not provide information as to the location for parking structures for Tier II, but rather indicated that sufficient parking would be included for the Tier II MLK Project. The 2011 FEIR indicated that development would include a mix of uses, “including medical office, commercial, retail, office space, recreation, and other development in support of the campus.”

On January 15, 2013, the County of Los Angeles Board of Supervisors adopted a Master Plan for the MLK Medical Center (2013 Master Plan). The 2013 Master Plan shows the Oasis Clinic continuing in its present location. The 2013 Master Plan was found consistent with the 2011 FEIR.

The first Tier II project was renovation of three floors of the Interns and Physicians Building as a recuperative care facility completed in 2015; a Categorical Exemption was prepared.

The second Tier II project was the East Campus Parking Structure. The East Campus Parking Structure was approved and 1<sup>st</sup> Addendum to the 2011 FEIR approved January 5, 2016. The East Campus Parking Structure was completed in May 2018.

The third Tier II project was the Child Care Center, with approximately 9,200 square feet, reusing portions of the Hudson Auditorium. The original Hudson Auditorium was 3,910 square feet. The Child Care Center was approved and 2<sup>nd</sup> Addendum to the 2011 FEIR approved January 31, 2017. The Child Care Center was completed in September 2018.

The fourth Tier II project, a 52,000-square-foot medical office building (MOB) was approved for the northeast corner of the MLK Campus (southwest corner of Wilmington Avenue and 120<sup>th</sup> Street), and 3<sup>rd</sup> Addendum approved by the Board of Supervisors September 26, 2017. Construction started in August 2018 and was completed in December 2019 with occupancy in Spring 2020.

The fifth Tier II project was renovation of the original MACC for a Behavioral Health Center (BHC) and demolition of the Hawkins Building. The BHC project was approved and 4<sup>th</sup> Addendum approved December 11, 2018. This BHC project was completed in Summer 2021. The demolition of the Hawkins Building is anticipated to take three months and to occur in 2026.

The sixth Tier II project was the 58,800 square foot Child and Family Wellbeing Center replacing the existing 12,265 square-foot Hub Clinic. The Child and Family Wellbeing Center, along with the 5<sup>th</sup> Addendum was approved April 23, 2019, and the building was completed in Summer 2023.

The 5<sup>th</sup> Addendum also evaluated two other projects:

1. The approximately 10,000 square foot APLA building that replaced the previous 2,380 square foot building. Construction was completed in 2021.
2. A 600-space North Parking Structure (NPS) was proposed to replace 170 surface parking spaces; it is currently in redesign and is now expected to be up to approximately 300 spaces and to start construction mid-March 2025 and be completed in the fall of 2026.

The currently Proposed Project is the demolition of the Oasis Clinic located north across 120<sup>th</sup> Street from the MLK Jr. Medical Center Main Campus (see **Figure 1** and **Figure 4** below) and construction of an approximately 9,345-square-foot TAY Drop-In Center; as noted above structures and operations of the Hub and Oasis Clinics are considered part of the MLK Campus structures and operations and are considered in the 2011 FEIR.

The currently Proposed Project would provide temporary safety, wellness services and basic support for Transitional-Age-Youth (TAY) between the ages of 18-25 years old. TAY generally refers to young adults, some of whom are exiting the foster care system, many of whom are experiencing homelessness or are at risk for homelessness, and face a number of challenges, including lack of access to housing, employment, and healthcare. They are also more likely to experience mental health and substance abuse problems.

Construction and operation of the TAY Drop-In Center would be required to comply with all the applicable mitigation measures identified in the 2011 FEIR and adopted by the Los Angeles County Board of Supervisors. The TAY Drop-In Center would be within the growth assumptions analyzed in the 2011 FEIR as well as the growth assumptions analyzed in the Willowbrook TOD Specific Plan Programmatic FEIR [2018 Willowbrook FEIR] (certified September 18, 2018; see Sections 2 and 3 of this Addendum for detailed descriptions and analyses by issue area). Table 1 below identifies all the mitigation measures from the 2011 FEIR as well as mitigation measures from the 2018 Willowbrook FEIR. Mitigation measures would be applied as appropriate and applicable to the currently Proposed Project. Therefore, the currently Proposed Project would be consistent with the evaluations presented in the 2011 FEIR as well as prior Addenda to the 2011 FEIR. To comply with CEQA (Public Resources Code Sections 21000 et seq.) and State CEQA Guidelines (California Code of Regulations Sections 15000 et seq., also referred to as Guidelines), this Addendum to the 2011 FEIR has been prepared to evaluate impacts from development of the TAY Drop-In Center.

## B. CEQA REQUIREMENTS AND REVISIONS TO CEQA GUIDELINES

### CEQA Requirements with Respect to Preparation of an Addendum

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

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

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

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

- D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

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

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

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

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

The currently Proposed Project is described in **Section 2** of this Addendum and would be within the assumptions for construction and operation analyzed in the 2011 FEIR. The currently Proposed Project has been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the *State CEQA Guidelines*. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified MLK Campus Redevelopment Project 2011 Final EIR is the appropriate environmental documentation under CEQA for the currently Proposed Project.

**Section 3** discusses issue-by-issue how the impacts anticipated for the currently Proposed Project would be within those previously identified in the 2011 FEIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the 2011 FEIR would continue to apply to the currently Proposed Project to ensure that all significant impacts remain less than significant where it is feasible to mitigate such impacts.

## Revisions to CEQA Guidelines

The California Natural Resources Agency adopted revisions to the *State CEQA Guidelines* that became effective on December 28, 2018, which occurred after preparation of the 2011 Final EIR. The most recent *State CEQA Guidelines* Appendix G is used in this document, as it is the latest checklist reflecting a clearer organization of issues; the changes did not add topics compared to what was evaluated in the Final EIR, rather topics are reorganized and clarified. As each topic is discussed in **Section 3**, the analysis notes where each topic was discussed in the Final EIR.

### C. ADOPTED MITIGATION MEASURES

The 2011 FEIR identified the mitigation measures shown in Table 1 as applicable to Tier II projects. These mitigation measures were previously adopted by the Board of Supervisors along with certification of the FEIR on October 11, 2011. As a result of Los Angeles County Department of Public Works (LACDPW) experience working on the MLK Campus, Cultural Measure-4 was refined in the 4th Addendum in order to clarify the measure and reflect current practices on the MLK Campus. The project is within the Willowbrook Transit Oriented Development (TOD) Specific Plan Area (see discussion below for further details on this Specific Plan). The 2018 Willowbrook FEIR imposed additional measures (air quality, cultural resources, noise, traffic and utilities) on projects within the Specific Plan area (some of the measures are the same as those in the 2011 FEIR); these additional mitigation measures are also included in **Table 1**. These measures will continue to be imposed as applicable and appropriate to each individual project undertaken pursuant to the MLK Project.

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

#### **Aesthetics**

Measure Aesthetics-1. All exterior lighting for building and on-site security lighting shall be shielded and directed downwards to minimize the impacts on the surrounding land uses. New development shall not include large expanses of reflective or otherwise glare-producing surfaces (such as windows or walls) on the facade. Additionally, any glazed north-facing facade shall be set over 200 feet from the street in order to ensure that it would not be subject to direct sunlight except very early and late in the day for a few winter days.

Measure Aesthetics-2. The County of Los Angeles shall review all plans for the Tier II development. Contractors shall conform with all design features described in the Campus Planning and Programming Report, which is intended to serve as a guide for development at the project site to ensure visual consistency and continuity at the project site and within the surrounding area.

Measure Aesthetics-3. All development shall be limited to three stories in height if the structure would be located along the western or eastern edge of the property. The existing setback includes the pediatric modular building/ oasis clinic located approximately 14 feet from the property line along the eastern boundary at Wilmington Avenue, Interns and Physicians Building at approximately 20 feet from property line along the western boundary at Compton Avenue, the Hawkins Building located at approximately 30 feet from property line along the northern boundary at 120th Street, and the Cooling Tower located at 44 feet from the property line along the south. Alternatively, if a structure would exceed three stories in height along the perimeter of the property (western or eastern perimeter only), at a minimum, the County of Los Angeles shall ensure that the building would be required stay within the approximately 20-foot and 14-foot existing campus respective western and eastern boundary setbacks to reduce shade and shadow

impacts to adjacent land uses along Compton Avenue and Wilmington Avenue.

Measure Aesthetics-4. Where parking lots or structures are adjacent to residential areas or near other sensitive light receptors along the southern portion of the campus, Compton Avenue, and Wilmington Avenue, retaining walls and/or landscaping of sufficient height shall be incorporated into the design of the proposed project to shield vehicle headlights (which typically sit at a minimum of 3 feet in height above ground). These project features shall be included in the landscape plans and final project design plans (to avoid and reduce potential light and glare obstructions that could impact residential areas).

#### **Air Quality**

Measure Air-1. Water or a stabilizing agent shall be applied during Tier I to exposed surfaces in sufficient quantity to prevent generation of dust plumes. Soil moistening shall be required to treat exposed soil during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. Prior to advertising for construction bids for each element, the plans and specifications shall be reviewed by the County of Los Angeles to ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that soil shall be moistened not more than 15 minutes prior to the daily commencement of soil-moving activities and three times a day, or four times a day under windy conditions (when winds exceed 25 miles per hour as instantaneous gusts), in order to maintain a soil moisture content of 12 percent, as determined by American Society for Testing and Materials method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency. The construction contractor shall demonstrate compliance with this measure through the submission of weekly monitoring reports to the County of Los Angeles. At a minimum, active operations shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type that is part of the active operation. The County of Los Angeles shall also ensure that the plans and specifications for each element of the project include a requirement for ground cover to be replaced in disturbed areas as quickly as practicable and that the County of Los Angeles appoints a construction relations officer to act as a community liaison concerning on-site construction activity including addressing issues related to fugitive dust generation.

Measure Air-2. Moistening or covering of excavated soil piles shall be required during Tier II to treat grading areas during construction of each element of the project to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure that excavated soil piles are watered hourly for the duration of construction or covered with temporary coverings.

Measure Air-3. Discontinuing Tier II construction activities that occur on unpaved surfaces during windy conditions (when winds exceed 25 miles per hour as instantaneous gusts) shall be discontinued to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in critical pollutants. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cease construction activities that occur on unpaved surfaces during periods when winds exceed 25 miles per hour as instantaneous gusts.

Measure Air-4. Track-out during Tier II shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday. Track-out is defined by the South Coast Air Quality Management District as any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure that the track-out shall not extend 25 feet or more from an active operation and that it would be removed at the conclusion of each workday. Street sweepers should also comply with SCAQMD Rules 1186 and 1186.1 and use reclaimed water, if available.

Measure Air-5. A wheel washing system shall be installed during Tier II, and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site. Washing of wheels leaving the construction site during construction of each element shall be required to avoid fugitive dust emissions, ensure compliance with current air quality standards, and avoid contributions to cumulative increases in criteria pollutants. The County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to clean adjacent streets of tracked dirt at the end of each workday or install on-site wheel-washing facilities.

Measure Air-6. All haul trucks hauling soil, sand, and other loose materials during Tier II shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). All transport of soils to and from the project site for each element shall be conducted in a manner that avoids fugitive dust emissions and ensures compliance with current air quality standards. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to cover all loads of dirt leaving the site or to leave sufficient freeboard capacity in the truck to prevent fugitive dust emissions en route to the disposal site.

Measure Air-7. Traffic speeds on unpaved roads during Tier II shall be limited to 15 miles per hour. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure a traffic speed limited to 15 miles per hour.

Measure Air-8. Heavy-equipment Tier II operations shall be suspended during first- and second-stage smog alerts. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element include the requirement for the construction contractor to ensure heavy-equipment operations be suspended during first- and second-stage smog alerts.

Measure Air-9. All equipment shall be turned off when not in use. Engine idling of all equipment used during both construction and operation/maintenance shall be minimized and/or limited to no more than five minutes in accordance with state law. All equipment engines shall be maintained in good operating condition and in proposed tune per manufacturers' specification. Prior to advertising for construction bids for each element of the project, the County of Los Angeles shall ensure that the plans and specifications for each element of the project include the requirement for the construction contractor to ensure the construction equipment meet the aforementioned criteria. All on-site construction equipment shall be required to meet U.S. EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Measure Air-10. Wherever possible, contractors shall use materials that do not require painting or use pre-painted materials. In order to minimize emissions of volatile organic compounds, contractors shall use high-pressure, low-volume paint applicators with a minimum transfer efficiency of at least 50 percent and coatings and solvents with a volatile organic compound content lower than required under South Coast Air Quality Management District Rule 1113, Architectural Coatings:

- Clear wood finishes: 275 grams/liter
- Floor coatings: 50 grams/liter
- Sealers: waterproofing sealers 100 grams/liter; sanding sealers 275 grams/liter; all other sealers 100 grams/liter • Shellacs: Clear 730 grams/liter; pigmented 550 grams/liter
- Stains: 100 grams/liter

Measure Air-11. The following measures shall be implemented, wherever feasible, to reduce operational air quality impacts:

- Improve traffic flow by signal synchronization
- Ensure County-owned campus vehicles use clean fuels such as compressed natural gas and that shuttle buses for the campus are "clean" buses, such as 2010 compliant vehicles
- Require all County of Los Angeles and County of Los Angeles contractor vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications
- Provide services that promote ridesharing and vanpools
- Provide charging stations or preferred parking for alternative technology vehicles
- Provide preferred parking for carpools and vanpools
- Reduce energy consumption by providing alternative energy sources on site and installing energy-efficient appliances

Additional mitigation measures included in the 2018 Willowbrook FEIR to be implemented as applicable to individual projects:

AIR-1: The County shall ensure that project approvals within the Specific Plan area require that all onsite construction vehicles and equipment with horsepower greater than 50 shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. If Tier IV interim equipment is not available, the contractor may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NOx and PM emissions comparable to that of Tier IV construction equipment. Where alternatives to USEPA Tier IV are utilized, the contractor shall be required to show evidence to the County that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit. In addition, contractors shall limit heavy-duty construction equipment idling time to 3 minutes, limit non-heavy-duty construction equipment idling time to 5 minutes, maintain construction equipment in good operating condition, use construction equipment that uses low-polluting fuels to the extent available and feasible (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline).

AIR-2: The County shall ensure that project approvals within the Specific Plan area require that all active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever possible.

AIR-3: Reduction or elimination of fireplaces within residential development such that there are no fireplaces within 95 percent of all new/redeveloped single family residential development or 100 percent of all multifamily residential development (new and redeveloped) within the Specific Plan area. Compliance would be ensured through County review prior to the issuance of a building permit.

AIR-4: All commercial development will use low-VOC architectural coating such that interior coatings do not exceed 10 grams per liter (g/l) of VOC content and exterior coatings do not exceed 100 g/l. This measure is to be made a condition of approval for continued upkeep of the property.

AIR-5: All commercial developments will use low-VOC cleaning supplies. This measure is to be made a condition of approval for continued upkeep of the property.

AIR-6: All new development shall comply with the Title 24 requirements in effect at the time of construction and shall, at a minimum, exceed 2013 Title 24 energy efficiency standards by 15 percent.

AIR-7: The County shall ensure that project approvals within the Specific Plan area require that any sensitive uses proposed to be located within 300 feet of the Metro tracks and within 500 feet of freeways shall be equipped with a filtered air supply system to maintain units under positive pressure when windows are closed. The ventilation system, whether a central HVAC (heating, ventilation and air conditioning) or a unit-by-unit filtration system, shall include high-efficiency filters meeting minimum efficiency reporting value (MERV) 13, per American Society of Heating, Refrigerating and Air- Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). The efficiency rating of the filtration system shall be determined based on a health risk assessment conducted for the proposed development, such that cancer and non-cancer risks are reduced to a 10 in one million increase in cancer risk, and less than 1 for non-cancer risk, unless thresholds are superseded by more current SCAQMD threshold. Air intake systems for HVAC shall be placed based on exposure modeling to minimize roadway air pollution sources. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology to minimize outdoor to indoor transmission of air pollution. Disclosure to the occupants (buyers and renters) shall be required regarding the proximity of Metro tracks (within a 300-foot radius) and freeways (within a 500-foot radius), the occurrence of diesel emissions from Metro trains and freeways heavy truck traffic), and the potential increased cancer and non- cancer risks associated with the development location.

**Cultural Resources**

Measure Cultural-1, Paleontological Resources. The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 15 or more feet below the ground surface that would have the potential to contact extant older Quaternary Alluvium. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, the County of Los Angeles shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology:

- Paleontological Resources Sensitivity Training is required for all project personnel prior to the start of ground-disturbing activities. This brief (approximately 15 minute) field training reviews what fossils are, what fossils might potentially be found, and the appropriate procedures to follow if fossils are found.
- Prior to any ground-disturbing activities, the County of Los Angeles shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain unique paleontological resources.
- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.
- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.
- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered; fossil specimens recovered, and associated specimen data.
- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.
- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the County of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the County of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Measure Cultural-2, Human Remains. Although the discovery of human remains is not anticipated during ground-disturbing activities for the proposed project, a process has been delineated for addressing the unanticipated discovery of human remains:

- Unanticipated Discovery of Human Remains (Public Resources Code 5097). The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the following conditions are met:
  - The Los Angeles County Coroner has determined that no investigation of the cause of death is required, and
  - Whenever the Native American Heritage Commission receives notification of a discovery of Native American human remains from the Los Angeles County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. If the remains are of Native American origin, the descendants from the deceased Native Americans shall complete their inspection and make recommendations or preferences in writing to the landowner or the person responsible for the excavation work, for treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.

Measure Cultural-3, Historical Resources. Potentially significant adverse impacts to historical resources have been identified in relation to five historical resources as a result of implementation of the Tier II project: the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium. Three mitigation measures have been identified in association with Tier II to reduce impacts to the maximum extent practicable. In the event that the five historical resources are not removed or otherwise impacted through significant modifications or alterations to the character-defining features of these resources, this impact would be less than significant and would not require mitigation. Tier II impacts to four significant historical resources (Multi-Service Ambulatory Care Center [MACC], Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource) shall be reduced to below the level of significance through utilization of the Secretary of the Interior's Standards for the treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings for any proposed alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

Measure Cultural-4, Historical Resources. Tier II impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center

(MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed. The documentation shall be in the form of a Historic American Building Survey and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include archival and other appropriate photographic recordation, detailed historic narrative report, measured architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be provided to the LA Public Library. Archival copies of the documentation shall be made available online and be available for review at the Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles.

Measure Cultural-5, Historical Resources. Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which is located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit should commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance. The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit should be completed within a period of no more than two years from the date of completion of Tier II of the proposed project.

Additional mitigation measures included in the 2018 Willowbrook FEIR to be implemented as applicable to individual projects:

CUL 4: Demolition of structures that meet the eligibility requirements for the CRHR and/or the County of Los Angeles Register shall be avoided. If demolition of a portion of an eligible structure cannot be feasibly avoided as determined by the County of Los Angeles, the alterations of a structure eligible as a historical resource shall be accomplished in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. To ensure compliance with this measure, the County shall determine the need for a historic resources evaluation of a structure if a structure is proposed for demolition or alteration and is or will be 50 years or older prior to project construction, or if a structure is proposed for demolition or alteration that affect the eligibility of a historic resource in the immediate surroundings of a structure proposed for demolition or alteration.

CUL-5: Avoidance, preservation or data recovery shall occur for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that developments in accordance with the Specific Plan do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Individual development projects or other ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the South Central Coastal Information Center; a Sacred Lands File Search by the Native American Heritage Commission (NAHC) and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, the County shall require that the resources are evaluated for their eligibility for listing in the California Register of Historical Resources and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the County, and local Native American representatives expressing interest.

During project-level construction, should prehistoric or historic subsurface cultural resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the County, and local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment

measures in consultation with the County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

CUL-6: The project applicant shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at five feet below ground surface and deeper. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to the County confirming findings of low potential.

If the qualified paleontologist, upon observing initial earthwork, determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by the County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and the County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and the County as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by the County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to an accepted by the County, shall signify satisfactory completion of the project program to mitigation impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

CUL-7: If human remains are encountered, the County or its contractor shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC will designate an MLD for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, County shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

### **Geology and Soils**

Measure Geology-1. The construction contractor shall incorporate best management practices consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. As discussed in the Geotechnical Investigation that was prepared for the project site, earthwork at the project site should be performed in conformance with the Los Angeles County Building Code and other guidelines provided in the geotechnical study, and under the observation and testing of a geotechnical engineer, in order to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills.

Measure Geology-2. Due to seismic compliance standards established by the Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or as required, the construction contractor shall incorporate project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or required standards, and thus further reduce any potential for impacts resulting from unstable geologic units and soils. The County of Los Angeles shall conform to measures described in the project geotechnical study(ies) to ensure compliance throughout the construction and development of the project.

Measure Geology-3. A geotechnical engineer shall be present on site for observation of earth-moving activities (such as site

preparation, excavation) to ensure proper subgrade preparation, selection of satisfactory materials, and placement and compaction of structural fills. Any unanticipated adverse conditions encountered shall be evaluated by the project engineering geologist and the soil engineer.

#### **Greenhouse Gases**

Measure Greenhouse Gases-1. Prior to construction of the proposed project, the final design plan and schemes for Tier II shall be reviewed to ensure that the County of Los Angeles conforms to its commitments pursuant to the California Climate Action Registry and the greenhouse gas emissions reduction targets established in Assembly Bill 32 are dependent on the incorporation of this mitigation measure, which is based on seven (7) of the sustainable design strategies or comparable measures recommended by the California Office of Attorney General to reduce carbon dioxide (CO<sub>2</sub>) emissions per capita:

- Design buildings to be energy efficient. Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings
- Create water-efficient landscapes
- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on site can drastically reduce the need for energy-intensive imported water at the site.)
- Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods
- Incorporate provisions for future public transit into project design
- Preserve and create open space and parks. Preserve existing trees, and plant replacement trees at a set ratio

The review shall further ensure that all applicable sustainable design measures or comparable measures have been incorporated into the final project design.

#### **Hazards and Hazardous Materials**

Measure Hazards-1. To reduce surface water quality impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction. A Spill Prevention Control and Countermeasures Plan shall be developed as a part of these requirements to address the handling of petroleum or other hazardous materials during refueling, operations and maintenance and other construction-related activities. The agencies noted here shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-2. To avoid exposure to asbestos-containing materials and lead-based paints during demolition, construction, and remediation activities, the County of Los Angeles and the Office of Statewide Health Planning and Development shall require that all such materials and wastes be identified and an Operations and Maintenance Plan developed prior to the issuance of demolition permits for each structure constructed prior to 1979. The Operations and Maintenance Plan shall ensure compliance with all applicable federal, state, and local requirements and specify all work to be done, including lead and asbestos surveys of structures to be demolished, proper handling and storage of lubricants and fuels for construction equipment, and methods for remediation of asbestos-containing materials and lead-based paints, if necessary. The Operations and Maintenance Plan shall be submitted to the County of Los Angeles Department of Health Services for review and approval prior to initiation of construction and demolition activities for the MACC building, emergency room, storage building or the cooling towers. The Operations and Maintenance Plan shall, as appropriate and necessary, conform to the requirements of the Los Angeles County Department of Health Services (Local Enforcement Agency), South Coast Air Quality Management District, the Los Angeles Regional Water Quality Control Board, and the Department of Toxic Substances Control. Compliance with the Operations and Maintenance Plan shall be monitored by the County of Los Angeles Regional Planning Department throughout construction and demolition.

To reduce impacts related to the accidental release of hazardous materials during construction, the County of Los Angeles shall ensure through its construction permitting process, or through enforcement of contractual obligations for its own projects, that all contractors transport, store, and handle construction-required hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended by California Department of Transportation, and the California Regional Water Quality Control Board, Los Angeles Region (including National Pollution Elimination Discharge Permits for storm water prior to construction.

These agencies shall regulate through the permitting process the monitoring and enforcement of this mitigation measure as required by law.

Measure Hazards-3. Prior to the issuance of grading permits for development, the County of Los Angeles shall ensure that a Soil Management Plan is prepared for the project site and that the Office of Statewide Health Planning and Development reviews the grading plans to ensure that the construction contractor is required to stop work and notify the Certified Unified Program Agency of the unanticipated encounter of underground storage tanks during grading activities. In the event that any leaking underground storage tanks are located or encountered, the County of Los Angeles Department of Public Works shall be notified and the underground storage tank shall be remediated in accordance with County of Los Angeles guidelines and consistent with specifications of the Department of Toxic Substances Control and other relevant standards. The County of Los Angeles Fire Department Health Hazardous Materials Division shall be notified of all other contaminated soils encountered during construction-related site activities.

Measure Hazards-4. To avoid exposure to asbestos-containing materials, lead-based paints, and petroleum hydrocarbon-contaminated soils during routine transport and disposal for both the construction phase and operational phase of the project, the County of Los Angeles shall require that the construction contractor store, use, and transport all hazardous materials in compliance with all relevant regulations and guidelines. The routine transport of hazardous materials to and from the Martin Luther King, Jr. Medical Center Campus during construction and operation of the elements of the project shall be accomplished via Wilmington Avenue, Compton Avenue, and 119th Street. Compliance shall be determined by monitoring by regulatory agencies. Transport, storage, and handling of construction-related hazardous materials shall be consistent with the guidelines provided by the California Department of Transportation, Los Angeles Regional Water Quality Control Board, the South Coast Air Quality Management District, and the Certified Unified Program Agency. Each agency shall regulate and enforce, through permitting and record keeping, the monitoring and enforcement of this mitigation measure.

Measure Hazards-5. At least 30 days prior to approval of Tier II final plans and specifications for development, the Office of Statewide Health Planning and Development shall review and provide comments on the plans and specifications to ensure compliance with all requirements of the Department of Toxic Substances Control and in order to verify that the site remains unlisted on the Hazardous Materials and Substance Sites List maintained by the California Environmental Protection Agency, Department of Toxic Substances Control.

#### Hydrology and Water Quality

Measure Hydro-1. The County of Los Angeles shall ensure that the construction, landscape features, and site grading for Tier II of the project comply with standard best management practices set forth by the Regional Water Quality Control Board. Prior to final plans and specifications for all elements of the project, the County of Los Angeles shall review the plans and specifications for all elements to ensure that the plans and specifications require the construction contractor to prepare a Standard Urban Stormwater Mitigation Plan for construction activities and implement best management practices for construction, materials, and waste handling activities, which will include, but not be limited to:

- Scheduling excavation, grading, and paving activities for dry weather periods.
- Controlling the amount of runoff crossing the construction site by means of berms and drainage ditches to divert water flow around the site.
- Identifying potential pollution sources from materials and wastes that will be used, stored, or disposed of on the site.
- Informing contractors and subcontractors about the clean storm water requirements and enforce their responsibilities in pollution prevention through a contractual agreement
- Sweeping the streets surrounding the proposed project site daily and trash removal throughout the construction of the project to avoid degradation of water quality.

Measure Hydro-2. The construction contractor shall incorporate Standard Urban Stormwater Mitigation Plan requirements and best management practices to mitigate storm water runoff, which include the following:

- The incorporation of bio-retention facilities located within the Project Area
- The incorporation of catch basin filtration systems
- The use of porous pavements to reduce runoff volume

Measure Hydro-3. In the event that groundwater is encountered during Tier I construction, the County of Los Angeles shall require the construction contractor complete the dewatering operations in accordance with the established National Pollution Discharge Elimination System permit requirements.

Measure Hydro-4. To ensure that operational impacts associated with Tier II remain below the level of significance, the County of Los Angeles shall require that best management practices and sustainable practices, such as regularly removing vegetation and debris

from curbs, catch basins, and outlets; limiting the amount of pesticides and fertilizers used in landscaping, and other best management practice as recommended by the Environmental Protection Agency or in the California Stormwater Best Management Practice Handbooks as ongoing maintenance measures, are implemented into a maintenance plan for the campus.

#### Noise

Measure Noise-1. The County of Los Angeles shall require that the plans and specifications require that construction equipment be equipped with state-of-the-art noise-muffling devices. Barriers or curtains shall be required to be installed close to equipment to shield the equipment from the receptor. Barriers or curtains utilized at the project site shall be required to reduce A-weighted construction noise levels at nearby sensitive receptors by a minimum of 10 decibels (dB) or to the maximum extent possible. The height and length of the barriers or curtains shall be determined based on the location of the construction activity and receptor. Because of the close proximity of the source and receptors, the noise impact would be dependent on the location of the noise sources. Prior to the start of demolition and construction, the contractor shall develop a noise control plan based on the actual equipment that will be used during demolition and construction, and the location of various demolition and construction activities. If the actual equipment noise levels are not available, equipment noises shall be measured in the field. The noise control plan shall predict the noise levels with actual equipment and with barriers or curtains in place. In addition, the plan shall take into account the demolition and equipment mix that would be operated at the same time. Equipment mix and/or the number of equipment operating shall be considered in reducing the noise levels.

Measure Noise-2. Prior to the completion of final plans and specifications, the County of Los Angeles shall ensure that the plans and specifications include a requirement that all demolition and construction equipment be properly maintained. All vehicles and compressors shall utilize exhaust mufflers. Engine enclosure covers as designed by the manufacturer shall be in place at all times. The County of Los Angeles shall monitor the use of heavy equipment during all demolition and construction activities to ensure conformance with the requirements of properly maintained heavy equipment.

Measure Noise-3. The distance at which impact pile driving would not exceed a peak particle velocity of 0.2 inch per second at a residence would be 55 feet. Therefore, the County of Los Angeles shall require that impact pile driving not be utilized within 55 feet of a residential structure. Should pile driving be necessary within 55 feet of a residence, sonic pile driving shall be utilized.

Measure Noise-4. The County of Los Angeles shall ensure that mechanical noise generated by the project is less than 45 A-weighted decibels (dBA) at residences immediately south (within approximately 50 feet)-of the project. This shall be achieved by implementing one, or a combination of more than one of the following strategies: utilizing quiet mechanical systems; locating mechanical systems away from residences (mechanical systems that produce a noise level of 55 dBA at 50 feet would need to be located a minimum of 160 feet from residences to bring mechanical noise levels below 45 dBA at residences), or utilizing insulating screens to break the line-of-sight between the mechanical systems and nearby residences.

Additional mitigation measures included in the 2018 Willowbrook FEIR to be implemented as applicable to individual projects:

NOI-1: Prior to the issuance of building permits, exterior areas of proposed single family and multiple family residential uses that are projected to be exposed to existing with project roadway noise levels and cumulative with project roadway noise levels exceeding the County's exterior noise standards (i.e., 60 dBA CNEL for single family residential and 65 dBA CNEL for multiple family residential) shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. To ensure that the County's exterior noise standards are met, the project applicant shall demonstrate compliance through the preparation of an acoustical evaluation.

NOI-2: Prior to the issuance of building permits, proposed residential developments adjacent to the Blue line and Union Pacific rail line that are exposed to rail noise of greater than 60 dBA CNEL for single family residential uses and 65 dBA CNEL for exterior areas of multiple family residential uses shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. To ensure that the County's exterior noise standards are met, the project applicant shall demonstrate compliance through the preparation of an acoustical evaluation.

NOI-3: Prior to approval of a grading permit or building permit, construction equipment shall be prohibited within 50 feet of occupied residential structures. If construction equipment is required to be within 50 feet of occupied residential structures, the project applicant shall demonstrate that the human annoyance threshold of 78 VdB (0.032 in/sec PPV) and structural damage thresholds of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec PPV for historic-age buildings that are extremely susceptible to vibration damage is achieved. Demonstration of compliance shall be provided through the preparation of a vibration analysis.

NOI-4: Prior to the issuance of a building permit for a residential development within 100 feet of the rail tracks, the project applicant shall demonstrate that nighttime vibration level at the proposed residential uses shall not exceed the 72 VdB (0.016 in/sec PPV) threshold for human annoyance.

**Traffic**

Measure Traffic-1. To reduce the traffic-related construction impacts, the County of Los Angeles shall require the construction contractor to provide a Construction Traffic Management Plan that is prepared in accordance with the California Department of Transportation's Construction Manual and Manual on Uniform Traffic Control Devices. The Construction Traffic Management Plan shall at the minimum address:

- Timing of deliveries of heavy equipment and building materials
- Directing construction traffic with a flag person
- Placing temporary signing, lighting, and traffic control devices if required, including, but not limited to, appropriate signage along access routes to indicate the presence of heavy vehicles and construction traffic
- Identifying if improvements to the intersection of 120th Street, Wilmington Avenue, or Compton Avenue are necessary to accommodate the turning radii needed by large trucks accessing site Identifying multiple alternate ingress/egress access point for the circulation of traffic and emergency response vehicles
- Determining the need for construction work hours and arrival/departure times outside peak traffic periods
- Ensuring access for emergency vehicles to the project site
- Temporary closure of travel lanes or disruptions to street segments and intersections during materials delivery, transmission line stringing activities, or any other utility connections
- Maintaining access to adjacent property
- Specification of both construction-related vehicle travel and oversize load haul routes, the minimization of construction traffic during the AM and PM peak hour, distributing construction traffic flow across alternative routes to access the proposed project site, and avoiding residential neighborhoods to the maximum extent feasible
- Identification of vehicle safety procedures for entering and exiting site access roads

Measure Traffic-2. In order to address the Tier II project impacts, the County of Los Angeles shall complete the following improvements:

- Compton Avenue / Imperial Highway, County of Los Angeles / City of Los Angeles: Re-stripe westbound approach to provide a separate right-turn lane. *[Fair share funding for currently Proposed Project = 16%.]*
- I-105 / Imperial Highway: Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet.
- Wilmington Avenue / El Segundo Boulevard: Re-stripe eastbound and westbound approaches to have separate right-turn lanes. Allow buses to go through the intersection from the right-turn lanes.

*Part of East Campus Parking Structure.*

- Central Avenue / 120th Street: Re-stripe northbound approach to provide a separate right-turn lane. *[Also, widen the east leg by 3 feet on each curbside (i.e., reduce sidewalk along 120th Street east of Central Avenue by 3 feet for approximately 120 feet and re-stripe westbound 120th Street approach to provide a left-turn, two through lanes and a separate right-turn lane. *[Cumulative impact of currently Proposed Project is not considered significant in the City of Los Angeles and fair share funding is not required.]**
- Wilmington Avenue / I-105 Eastbound Ramps, County of Los Angeles / California Department of Transportation: Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach shall have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on both sides of Wilmington Avenue (as noted above) shall be reduced by 2 feet and the Wilmington Avenue roadway shall be widened by 2 feet on both sides (a total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians).
- Wilmington Avenue / 118th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Re-stripe the westbound approach to provide a separate right-turn lane and a shared left-through lane. Northbound approach shall have the same lane geometry as existing conditions. Under cumulative conditions, widen 118th Street roadway by 4 feet and re-stripe to provide a separate right-turn lane and shared left-through lane along the eastbound approach. *[Fair share funding for currently Proposed Project = 28%.]*
- Wilmington Avenue / 120th Street–119th Street, County of Los Angeles: Widen Wilmington Avenue roadway by 2 feet on both sides and restripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane. Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median

adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. Hospital Driveway entrance. Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions.

*As partial implementation of the above measure to address impacts of the East Campus Parking Structure, the northbound approach to the intersection is to be re-stripped to provide two northbound through lanes and one dedicated right-turn lane (on-street parking for 100 to 150 feet south of the intersection to be removed, approximately seven spaces).*

- Wilmington Avenue / Martin Luther King, Jr. Hospital Entrance–120th Street, County of Los Angeles: Re-stripe southbound approach to provide a separate right-turn lane, two through lanes, and a left-turn lane. Provide three northbound receiving lanes and restrict on-street curb parking along the eastside of Wilmington Avenue between Martin Luther King, Jr. Hospital Driveway and 120th Street and 120th Street and 119th Street during morning and evening peak hours. Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane.

*As partial implementation of this measure to address impacts of the East Campus Parking Structure only, the addition of a left turn lane to the existing (eastbound) driveway configuration, creating a three-lane approach to Wilmington Avenue. As the new eastbound approach would include overlapping left turn lanes, the east-west signal phasing to be modified to operate as separate split phases. This requires modification of the traffic signal, possibly including upgrades of signal mast arms for those two approaches.*

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

Measure Traffic-3. In order to address the Tier II cumulative projects impacts, using County of Los Angeles traffic study guidelines, the following mitigation measures shall be implemented to alleviate the cumulative significant impacts:

- Avalon Boulevard / El Segundo Boulevard, County of Los Angeles: Widen northbound approach by 2 feet and re-stripe the approach to provide a left turn lane, two through lanes, and a separate right-turn lane (10 feet, 10 feet, 10 feet, 12 feet). The approach could be widened by narrowing the 5-foot-wide median to a 3-foot-wide median, or by reducing the 12-foot-wide sidewalk to a 10-foot-wide sidewalk. This widening would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection.
- Alameda Street / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe northbound/southbound approaches and provide a southbound right-turn lane. The lanes along the north leg shall be re-stripped to provide 13-foot and 11-foot receiving lanes; 10-foot, 11-foot, 10-foot, and 12-foot approach lanes for southbound left-turn lane, southbound through lanes, and southbound right-turn lanes, respectively. The lanes along the south leg would have a 13-foot shared right through-way, 11-foot through lane, 10-foot left-turn lane, 12-foot receiving lane, and a 20-foot receiving lane. Remove two on-street parking spaces along the southbound approach during peak hours.
- Alameda Street / 103rd Street, County of Los Angeles / Lynwood: Re-stripe eastbound approach to provide a 10-foot, left-turn lane and a 12-foot, left-right shared lane. The receiving lane would be re-stripped for 18.5 feet.
- Central Avenue / Rosecrans Avenue, County of Los Angeles / Compton: Re-stripe westbound approach to provide a separate right-turn lane. Allow buses to go through the intersection from the right-turn lane. *[Fair share funding for currently Proposed Project = 8%.]*
- Central Avenue / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right-turn lane. *[Fair share funding for currently Proposed Project = 6%.]*
- Central Avenue / El Segundo Boulevard, County of Los Angeles / Compton: Re-stripe southbound approach to provide a separate right-turn lane. Widen northbound approach by reducing median by 1 foot to 2 foot. Provide re-striping to show a separate northbound right-turn lane. Allow buses to go through the intersection from the right- turn lane.
- Alameda Street / Imperial Highway, County of Los Angeles / City of Lynwood: Re-stripe southbound approach to provide the following roadway geometry: two left-turn lanes, two through lanes, and one right-turn lane.

The appropriate conceptual signing and striping plans shall be submitted to the County of Los Angeles Department of Public Works, Traffic and Lighting Division for review and approval during the planning phase.

Measure Traffic-4. Along the southbound approach of Alameda Street, the County of Los Angeles shall provide two left-turn lanes, two through lanes and one right-turn lane instead of one left-turn lane, two through lanes and a separate right-turn lane (i.e., add a

second left turn lane). In addition, the County of Los Angeles shall provide the required signal hardware and supporting software to facilitate a right-turn arrow signal indication for southbound right-turn overlap with eastbound-westbound left-turns at the intersection.

Additional mitigation measures (and one modified mitigation measure) included in the 2018 Willowbrook FEIR to be implemented as applicable to individual projects:

TRAF-1: Avalon Boulevard / El Segundo Boulevard, County of Los Angeles: The County of Los Angeles shall ensure the restriping of the southbound approach to provide a separate right turn lane by narrowing the median to 2 feet prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane.

TRAF-2: Central Avenue / El Segundo Boulevard, County of Los Angeles / Compton. In addition, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right turn lane by narrowing the median to 2 feet prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane.

TRAF-11: Alameda Street / Imperial Highway, County of Los Angeles / City of Lynwood: Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the southbound approach for dual right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane, two through lanes, and a right-turn lane to dual left-turn lanes, two through lanes, and a separate right-right lane. *This is in addition to the mitigation measure in the Martin Luther King Jr. Medical Campus EIR.*

TRAF-13: Wilmington Avenue and Greenleaf Boulevard, City of Compton: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-14: Compton Avenue and El Segundo Boulevard, City of Compton: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the eastbound and westbound approaches to provide separate right-turn lanes by narrowing the medians to 2 feet. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-15: Wilmington Avenue and Rosecrans Avenue, City of Compton: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane by narrowing the median to 2 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM and PM peak hours level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-16: Wilmington Avenue and W. Compton Boulevard, City of Compton: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing

additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-17: Wilmington Avenue and Alondra Boulevard, City of Compton. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach to provide a separate right-turn lane by narrowing the median to 3 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the PM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-18: Wilmington Avenue and Walnut Street, City of Compton: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping and modifying the eastbound approach from a left-turn lane, a through lane, and a right-turn lane to left- turn lane, a through lane, and a through-right lane. It requires converting Walnut Street east of the intersection from one lane eastbound to two-lanes eastbound for a minimum of 400 feet providing an 11-foot lane and a 12- foot curb lane prior to merging back to one lane, and prohibiting on-street parking for the same distance. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-19: Imperial Highway and State Street, City of Lynwood: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide separate right-turn lanes. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. These improvements require removal of two on-street parking spaces on each approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Lynwood. The proportionate share funding shall be provided by the project applicant if the City of Lynwood has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-20: Avalon Boulevard and Imperial Highway, City of Los Angeles: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of- way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-21: Avalon Boulevard and 120th Street, City of Los Angeles: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of- way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-22: Central Avenue and Imperial Highway, City of Los Angeles: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of- way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-23: Central Avenue and I-105 WB Ramps, City of Los Angeles: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach from a left-turn lane, a through-left lane, and right-turn lane, to a left-turn lane, a through-right lane, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los

Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism.

TRAF-24: Central Avenue and 120th Street: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane. This improvement would modify the approach from a left-turn, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a separate right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. The proportionate share funding of the restriping improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM and PM peak hours' level of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-25: Wilmington Avenue and 112th Street: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of installation of a new traffic signal at this location because the signal warrant analysis indicated that a traffic signal would be warranted. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-26: Freeway Segment, I-110 southbound between 135th Street and Rosecrans Avenue: Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

Cumulative Mitigation Measures from the 2018 Willowbrook FEIR to be implemented as applicable:

TRAF-27: Willowbrook and Rosecrans Avenue, City of Compton: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-28: Central Avenue and Compton Boulevard, City of Compton: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This improvement requires removal of five on-street parking spots on the northbound approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-29: Central Avenue and Alondra Boulevard, City of Compton: Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement of this intersection.

TRAF-30, 31, 32: Freeway segments -- I-105 westbound between Avalon Boulevard and Central Avenue; I-105 westbound between Compton Avenue and Wilmington; I-105 westbound between State Street and Long Beach Boulevard: Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In

furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

TRAF-33: I-110 off-ramp at El Segundo Boulevard: Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this off-ramp through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

TRAF-34, 35, 36, 37: CMP Mainline Freeway Monitoring Stations – I-105 eastbound (West of 710, East of Harris Avenue), I-105 westbound (West of I-710, East of Harris Avenue), I-105 eastbound (East of Bellflower Boulevard, West of I-605), I-105 westbound (east of Bellflower boulevard, West of I-605): Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this freeway location through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

#### Utilities

Measure Utilities-1. Prior to issuance of the permits to connect to the sewer system, the County of Los Angeles shall ensure payment of the connection fee for the capital facilities has been submitted to the appropriate Sanitation Districts of Los Angeles County for compliance with the California Health and Safety Code.

Measure Utilities-2. The County of Los Angeles shall review the plans and specifications for the project and the parking facilities to ensure that adequate service areas are provided for trash and recycling receptacles for compliance with applicable federal, state, and local statutes related to solid waste, and to reduce direct and cumulative impacts from project operation and maintenance to below the level of significance. Prior to advertising for construction bids for the new building, the County of Los Angeles shall ensure that the plans and specifications designating locations for trash receptacles and recycling receptacles are in conformance with the California Solid Waste Reuse and Recycling Access Act of 1991. Wherever trash receptacles are provided throughout the project site, a recycling receptacle for plastic, aluminum, and metal shall also be provided. Signs encouraging patrons to recycle shall be posted near each recycling receptacle.

To ensure conformance with the Solid Waste Management Act of 1989, the County of Los Angeles shall require the construction contractor to manage the solid waste generated during construction of each element of the project by diverting at least 50 percent of solid waste from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. The construction contractor shall submit a construction solid waste management plan to the County of Los Angeles for approval prior to initiation of demolition activities. The construction contractor shall demonstrate compliance with the solid waste management plan through the submission of monthly reports during construction and demolition activities that estimate total solid waste generated and diversion of 50 percent of the solid waste.

Additional mitigation measures included in the 2018 Willowbrook FEIR to be implemented as applicable to individual projects:

**USS-1:** Prior to the issuance of a building permit, the individual project applicants shall submit a sewer study that confirms that the existing trunk sewers have adequate capacity to accommodate the projected wastewater flow from the proposed individual project as well as cumulative projects. If the projected wastewater flow exceeds the existing sewer capacity, the sewer trunk(s) shall be upgraded to accommodate the projected wastewater. Construction activities shall use best management practices to reduce (1) noise levels and limit construction in accordance with the County Code, (2) air quality and greenhouse gas emissions in accordance with the thresholds identified by the South Coast Air Quality Management District (see Section 3.2, Air Quality and Section 3.5, Greenhouse Gas Emissions in this EIR) and (3) traffic safety issues through the implementation of a traffic control plan that includes features such as signage, land closures, flaggers, detours and notifications to surrounding property owners.

*Notes: Measures Traffic-2, Traffic-3 and Traffic-4 as well as Traffic mitigation measures from the 2018 Willowbrook FEIR to be implemented as required prior to any impacts occurring consistent with County policies; these measures are not required to be implemented for the currently Proposed Project as the TAY Drop-In Center would not generate a net increase in trips.*

*Each Tier II project is analyzed to determine when mitigation measures must be implemented in order to ensure that impacts are mitigated in accordance with the 2011 FEIR.*

*Source: 2011 FEIR and Willowbrook TOD Specific Plan EIR*

## D. SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN 2011 FEIR COMPARED TO IMPACTS OF CURRENTLY PROPOSED PROJECT

Unavoidable significant adverse environmental impacts identified for the 2011 FEIR for Tier II projects as compared to impacts of the currently Proposed Project –are summarized in **Table 2** below:

**Table 2**  
**Comparison of Significant Impacts**  
**2011 FEIR Compared to Impact of the Currently Proposed Project**

Issue Area	2011 FEIR MLK Medical Center Campus Redevelopment Project	Currently Proposed Project TAY Drop-In Center
<b>Air Quality</b>	<p>Construction: Emissions would exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors.</p> <p>Operations: Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10. The Willowbrook FEIR similarly identified significant impacts as a result of construction and operation; however it identified impacts to sensitive receptors as less than significant.</p> <p>Mitigation Measures Air-1 through Air-10 as well as applicable measures from the 2018 Willowbrook FEIR (AIR-1, AIR-2, AIR -4 and AIR-6) would reduce but not eliminate air quality impacts during construction to the maximum extent feasible. Mitigation Measure Air-6 (and AIR-5 from the 2018 Willowbrook FEIR) would reduce but not eliminate air quality impacts during operation.</p>	<p>Construction of the TAY Drop-In Center could overlap with construction of the North Parking Structure (NPS) as well as demolition of the Hawkins Building. Such simultaneous construction would be spread over a relatively large area and would not result in greater impacts than anticipated in the 2011 FEIR. The 2011 FEIR assumed construction activities up to the MLK Campus property lines, immediately adjacent to sensitive receptors. Construction activities associated with the currently Proposed Project would occur 140 feet from a 5-story apartment building (the NPS would be closer to the apartment building – approximately 50 feet from the building). While emission controls have reduced emissions from construction equipment since the 2011 FEIR was certified, conservatively, air quality impacts to sensitive receptors are still considered to be significant; however, they would be well within the impacts analyzed in the 2011 FEIR. While the TAY Drop-In Center would not generate a net increase in trips, it would be part of the MLK Tier II development and as such would be a part of the operational unavoidable significant impact identified for the entire Tier II development.</p>
<b>Cultural Resources</b>	<p>Implementation of mitigation measures Cultural-4 and Cultural-5 would reduce Tier II impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium as a result of Tier II of the MLK Project to the maximum extent feasible. The demolition/removal of any one historical resource still would remain significant and unavoidable. The 2011 FEIR identified mitigation for demolition/removal of all five historic resources and identified a residual significant adverse impact as a result. The 2018 Willowbrook FEIR also identified impacts to historic resources on the MLK Campus as significant. Mitigation Measures Cultural-3, Cultural-4 and Cultural-5 as well as CUL-4 from the Willowbrook</p>	<p>The TAY Drop-In Center would have no impact on historical resources as the building to be removed is a modern building constructed in 2000.</p>

Issue Area	2011 FEIR MLK Medical Center Campus Redevelopment Project	Currently Proposed Project TAY Drop-In Center
	FEIR would reduce but not eliminate impacts.	
<b>Greenhouse Gas Emissions</b>	Mitigation Measure GHG-1 would reduce CO2 emissions contributed by operation of Tier II of the MLK Project, thereby assisting compliance with the goals of AB 32 to reduce CO2e emissions to 1990 levels by the year 2020. Mitigation Measure GHG-1 would ensure that indirect and cumulative GHG emission impacts would be reduced to the maximum extent feasible. However, potential GHG emission impacts associated with construction and operation of Tier II would remain significant and unavoidable. The 2018 Willowbrook FEIR also identified impacts to Greenhouse Gas Emissions as significant.	The TAY Drop-In Center would be part of the MLK Tier II development and as such would be a part of the unavoidable significant impact for the entire Tier II development.
<b>Noise (Construction)</b>	The 2011 FEIR indicates that construction noise levels would exceed the 75 dBA permissible level at residences that are within 80 feet of the MLK Project construction. Therefore, noise impacts from construction, while temporary, were identified as significant and unavoidable. Implementation of mitigation measures Noise-1 through Noise-3 would reduce impacts. In addition, the 2018 Willowbrook FEIR identifies mitigation measures (NOI-3) that would reduce construction noise and vibration and concludes that due to the temporary nature of construction, impacts would be less than significant impact.	The TAY Drop-In Center includes construction of an approximately 9,345-square-foot building about 140 feet from a five-story apartment building. Construction could overlap with that of the four-story North Parking Structure that would be closer to the apartment building (about 50 feet) as well as demolition of the Hawkins Building (400 feet to the southwest). Conservatively it is anticipated that construction activity could result in short-term significant impacts, as discussed in the 2011 FEIR.
<b>Traffic</b>	The 2011 FEIR <b>did not</b> identify significant adverse impacts with respect to traffic. However, the 2018 Willowbrook FEIR did identify significant impacts related to delay at certain intersections. Since publication of that EIR, CEQA has been revised to focus on vehicle miles travelled (VMT) as the appropriate metric to determine significant impacts under CEQA. Mitigation measures previously identified in connection with reducing delay will be implemented as appropriate consistent with State and County policies.	The currently Proposed Project would not result in a net increase in vehicle trips or VMT.

Other impacts analyzed in the 2011 FEIR (aesthetics; geology and soils; hazards and hazardous materials; hydrology and water quality; population and housing; public services; recreation; traffic and transportation; and utilities and service systems) were determined to be less than significant (see **Table 3** below for a summary comparison of all impacts analyzed in the 2011 FEIR compared to impacts of the currently Proposed Project. As discussed in the detailed analyses below, even though the currently Proposed Project includes components that are not on the main MLK Campus, the mitigation measures identified in the 2011 FEIR would reduce impacts to a less than significant level for the same issues that are reduced to a less than significant level in the 2011 FEIR. In addition, the mitigation measures identified in the 2018 Willowbrook FEIR would further reduce impacts.

## E. INCORPORATION BY REFERENCE

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

- County of Los Angeles, Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment, certified Final Environmental Impact Report, certified October 11, 2011. Referred to herein as the 2011 FEIR (SCH No. 2010031040).
- County of Los Angeles, Willowbrook Transit Oriented Development (TOD) Specific Plan, approved September 2018 and Willowbrook Transit Oriented Development Programmatic FEIR, certified September 2018 (SCH No. 2015101106). Referred to herein as the 2018 Willowbrook FEIR.

These documents are available for review at the LA County Department of Public Works, Project Management Division, 900 South Fremont Avenue, 5th Floor, Alhambra, CA 91803.

## F. SUMMARY OF EFFECTS

**Section 3** of this Addendum includes a detailed evaluation of any potential change in effects associated with development of the currently Proposed Project for each CEQA environmental issue area, organized consistent with the Appendix G of the *State CEQA Guidelines*. As summarized above, impacts would either be comparable or reduced as compared to those identified in the 2011 FEIR. Therefore, as discussed in this Addendum, the currently Proposed Project would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the *State CEQA Guidelines*, and therefore an Addendum to the 2011 FEIR is the appropriate CEQA document to address these changes.

## 2. DESCRIPTION OF CURRENTLY PROPOSED PROJECT

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### A. PROJECT LOCATION AND BACKGROUND

The project site is the existing 38-acre (1,344,219 square feet) MLK Medical Center Campus, plus the locations of the Hub and Oasis clinics both located north of 120<sup>th</sup> Street. The MLK Campus has the address 12021 Wilmington Avenue and is located in the unincorporated area of Willowbrook, County of Los Angeles (County), California (see **Figure 1**).

The subject of this Addendum is the approximately 0.3-acre (14,600 square foot) TAY Drop-In Center site (including the existing approximately 6,000 square foot Oasis Clinic and about eight surface parking spaces) is located immediately north of the MLK Campus across 120<sup>th</sup> Street adjacent to the LA County Fire Station 41 that also fronts on 120<sup>th</sup> Street.

An approximately 300-space parking structure (North Parking Structure) to serve the MLK Campus is proposed<sup>2</sup> immediately north of the TAY Drop-In Center site (currently 170 surface parking spaces are located where the parking structure is proposed); a five-story apartment building is located east of the proposed parking structure site about 140 feet northeast of the TAY Drop-In Center site. The recently-constructed Child and Family Wellbeing Center facility is located about 50 feet west of the TAY Drop-In Center site. Modular buildings containing the Drew Child Development Corporation and Charles Drew University uses are located about 60 feet northwest of the TAY Drop-In Center site.

The MLK Campus and associated sites are in the unincorporated Willowbrook Community of the County of Los Angeles. It is less than 1 mile north of the City of Compton, less than 1 mile south of the City of Los Angeles, and less than 1 mile west of the City of Lynwood.

The project area is well-served by transit. The Willowbrook Rosa Parks Light Rail Station that serves both the A Line (formerly Blue Line) and C Line (formerly Green Line) is located about 1,400 feet northeast of the TAY Drop-In Center site. In addition, numerous bus lines run along 120<sup>th</sup> Street adjacent to the TAY Drop-In Center site on the south and Wilmington Avenue about 400 feet to the east.

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<sup>2</sup> The North Parking Structure was evaluated in the 5<sup>th</sup> Addendum with 600 spaces. It is currently going through re-design and approximately 300 spaces are currently proposed. Because of its proximity to the TAY Drop-In Center site, some issue area analyses in this 6<sup>th</sup> Addendum consider impacts of construction of both the TAY Drop-In Center and North Parking Structure.



SOURCE: Google Earth, 2024.

FIGURE 1

# Project Location

The project site is located approximately 3 miles north of State Route 91 (SR-91; Artesia Freeway), approximately 3 miles northeast of Interstate 710 (I-710; Long Beach Freeway), approximately 2 miles east of I-110 (Harbor Freeway), less than 1 mile south of SR-90 (East Imperial Highway), and less than 1 mile south of I-105 (Glen Anderson Freeway).

The topography in the vicinity of the currently Proposed Project is generally flat.

### **2011 Final EIR**

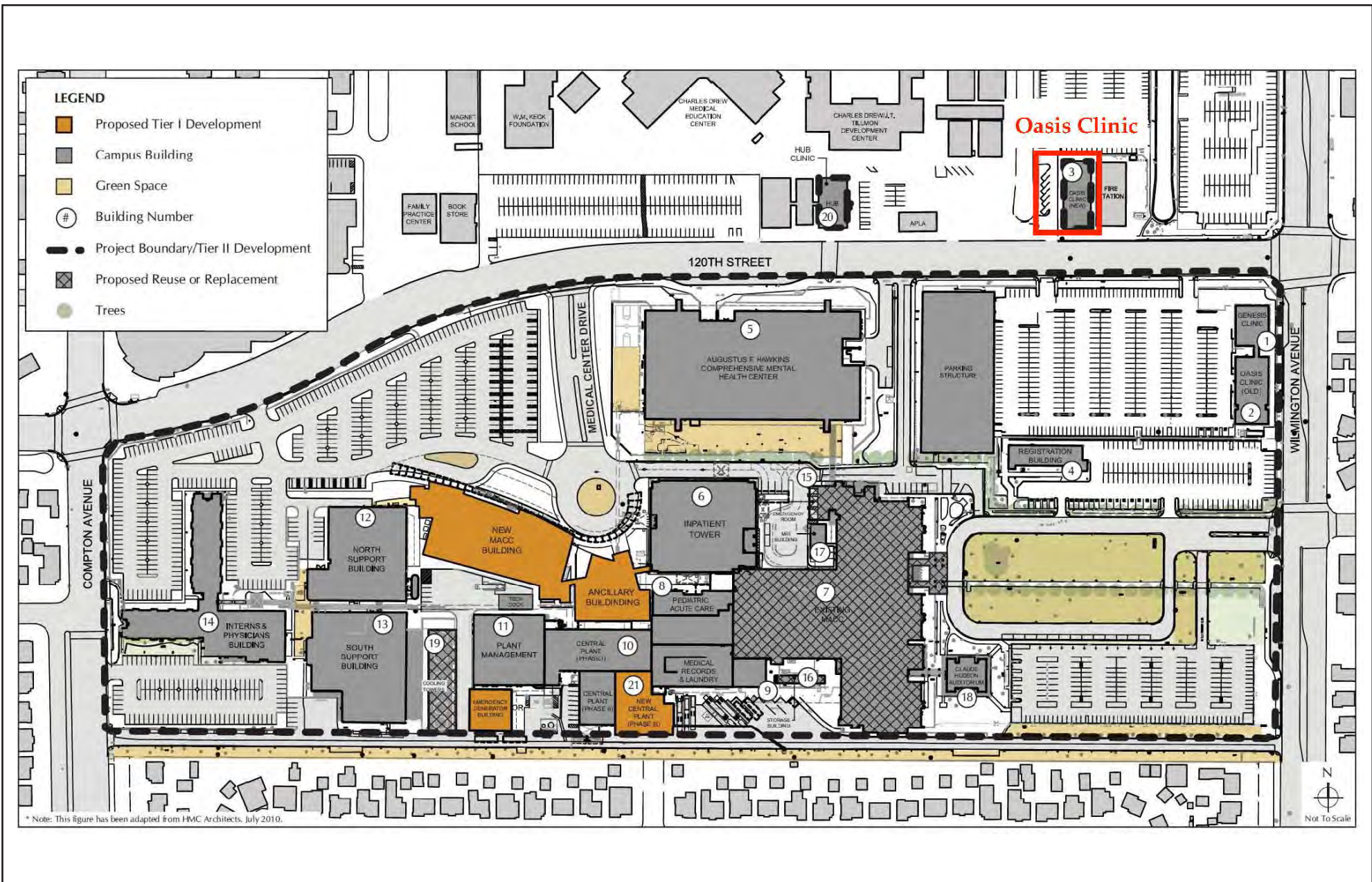
The 2011 FEIR evaluated specific near-term (Tier I) projects and conceptual longer-term (Tier II) projects on the MLK Campus (see **Figure 2**). The currently Proposed Project is part of Tier II construction for the larger MLK Project.

The 2011 FEIR indicated that Tier II would potentially build out approximately 1,814,696 square feet of hospital-related development including medical offices, commercial, retail, office space, and other development in support of the mixed-use campus. The 2011 FEIR stated that Tier II development would provide “sufficient parking” for mixed-use development. The 2011 FEIR analyzed an envelope of construction extending up to 78 feet tall (including all appurtenances).

### **2013 Master Plan**

In 2013 the Board of Supervisors adopted the MLK Medical Center Master Plan (2013 Master Plan) for the MLK Campus, which was found to be consistent with the 2011 FEIR (see **Figure 3**). The focus of the 2013 Master Plan was to provide for the growth and development of 124 acres in the Willowbrook community focused on the MLK Campus.

The 2013 Master Plan shows the north side of 120<sup>th</sup> Street designated for Education with a four-story University Expansion. The Oasis Clinic is shown as remaining in place in the 2013 Master Plan. The 2013 Master Plan indicates that the LA County Zoning Code would require 2,394 parking spaces for buildout. The total parking spaces indicated to be provided in the 2013 Master Plan is 2,553 spaces (a surplus of 159 parking spaces). In accordance with County requirements, the 2013 Master Plan incorporates Low Impact Development (LID) Best Management Practices (BMPs) to manage stormwater runoff from the MLK Campus. The 2013 Master Plan indicates that further geotechnical testing will need to be conducted to verify that the actual infiltration rates are technically infeasible to permit infiltration.



SOURCE: County of Los Angeles, MLK Medical Center Campus Final EIR, Volume III, 2011.

FIGURE 2

Site Plan Analyzed in the 2011 FEIR



SOURCE: County of Los Angeles, MLK Medical Center Campus Master Plan & The Willowbrook MLK Wellness Community Vision, 2012.

FIGURE 3

## Current Status of Master Plan

Tier I of the MLK Project was completed over time, with all buildings substantially complete by the end of 2013. Tier I included development of a new MACC Building (132,000 square feet) and Ancillary Building (24,700 square feet) as well as emergency generator (4,223 square feet) and Central Plant (9,409 square feet). Tier I also included tenant improvements to: North Support Building (52,276 square feet), South Support Building (34,762 square feet), and the Plant Management Building (15,648 square feet); and site improvements. Relocation of the modular MRI Building (1,100 square feet) to the dock area north of the North Support Building occurred in 2019.

Other small replacement modular buildings that were considered exempt from CEQA to be completed in the near term include relocation of the existing modular Red Bag Storage (2,800 square feet) and DHS Regional Clinical Laboratory (8,000 square feet) both anticipated to be completed in Fall 2024.

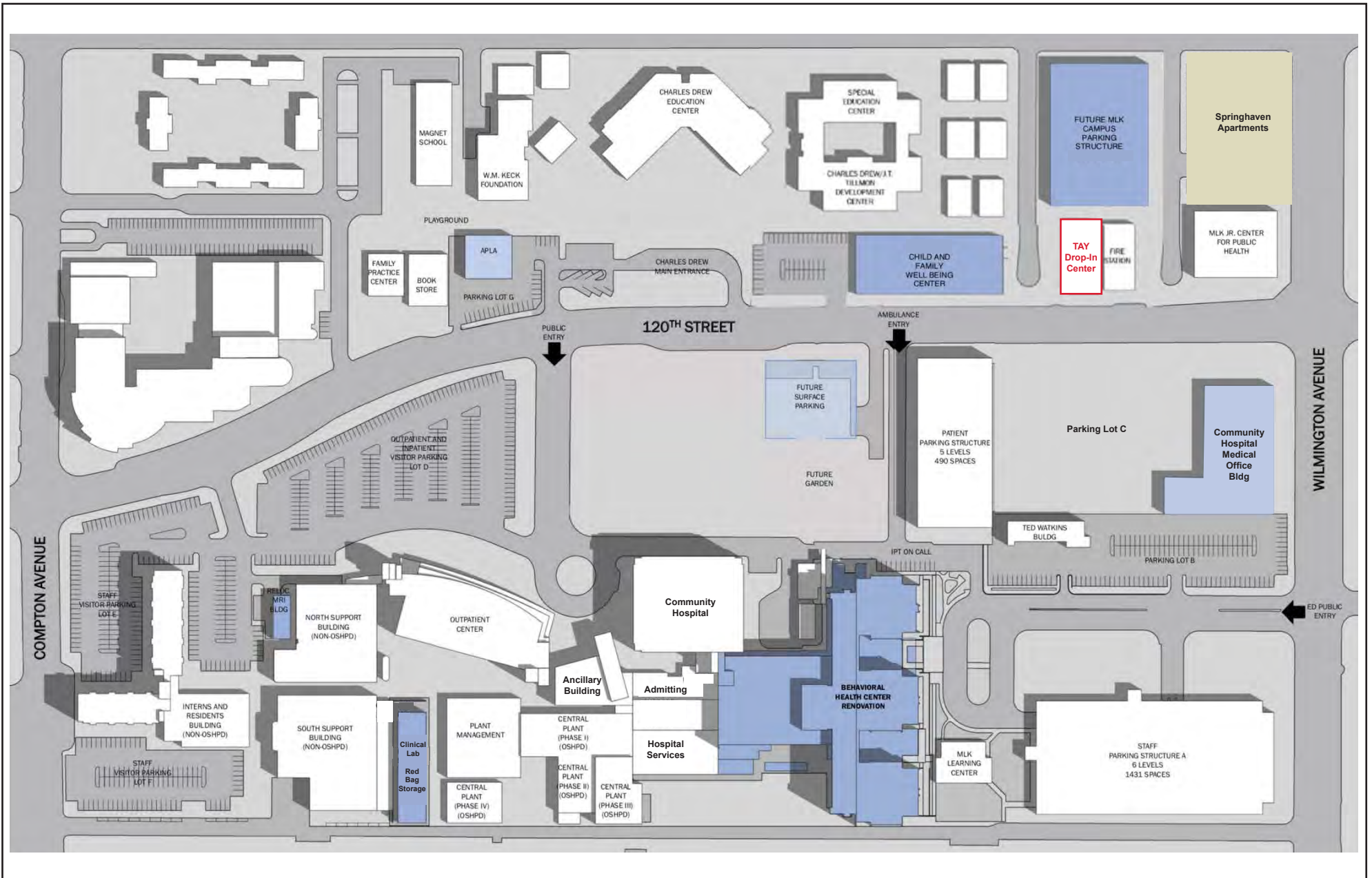
The adaptive reuse of three floors of the Interns and Physician Building as a recuperative care facility was the first Tier II project to be completed (in 2015). The East Campus Parking Structure was the second Tier II project and was completed in 2018. A Child Care Center, the third Tier II project, was completed in September 2018. A medical office building at the northeast corner of campus, the fourth Tier II project was completed in Spring 2020. The fifth Tier II project, the Behavioral Health Center (BHC) renovation of the original MACC was completed in 2021.

The demolition of the Hawkins Building would take approximately three months and is anticipated to be completed in 2026.

As noted above, the sixth Tier II project included three components: The 58,800-square foot Child and Family Wellbeing Center project was completed in Summer 2023; and the approximately 10,000 square foot replacement APLA Building was completed in 2021. The North Parking Structure is currently in redesign (now anticipated to be approximately 300 spaces) and is expected to be completed in 2026.

The proposed seventh Tier II project (currently Proposed Project) is the subject of this 6<sup>th</sup> Addendum and is the construction of an approximately 9,345 square foot building to house the TAY Drop-In Center. It would replace and is anticipated to be approximately constructed within the footprint of the existing approximately 6,000 square foot Oasis Clinic. The associated eight surface parking spaces are anticipated to remain.

**Figure 4** shows the overall 2024 Master Plan including the TAY Drop-In Center site. The TAY Drop-In Center is currently in the initial planning phase; construction of the two-story building is anticipated to occur within the footprint of the existing Oasis Clinic building. However, a site plan and building plans have not yet been prepared.



SOURCE: County of Los Angeles, 2024.

FIGURE 4

## Willowbrook Transit-Oriented District (TOD) Specific Plan

The project site is within the Willowbrook Transit-Oriented District (TOD) Specific Plan area. The Specific Plan was approved by the Board of Supervisors in September 2018 and an associated Programmatic FEIR was certified at the same time (2018 Willowbrook FEIR). The 2018 Willowbrook FEIR builds upon, extends and updates many of the analyses in the 2011 FEIR.

The objectives of the specific plan are:

- Provide a transit-oriented development near the Willowbrook/Rosa Parks Station.
- Improve bicycle and pedestrian mobility and safety as well as access to the Willowbrook/Rosa Parks Station.
- Preserve and enhance Willowbrook's economic base and character.
- Provide additional housing for Willowbrook's varied income groups.
- Revitalize the health care services at Martin Luther King, Jr. (MLK) Medical Center.
- Revitalize the services at Charles R. Drew University of Medicine and Science (CDU).
- Preserve the character of the existing residential neighborhoods.
- Create an attractive environment for pedestrians, bicyclists, Metro riders, and local transit users through streetscape improvements.

The currently Proposed Project is consistent with the Willowbrook TOD Specific Plan and its associated Programmatic FEIR (2018 Willowbrook FEIR) as the proposed use is within the assumptions for growth in each subarea of the Specific Plan and meets objectives related to revitalizing healthcare and services. The TAY Drop-In Center (and the adjacent proposed North Parking Structure) would be in the MLK Medical Center and Associated Facilities Subarea with a Specific Plan zone designation of MLK Medical Overlay (FAR 2.5) and a General Plan designation of MU - Mixed Use.

The Willowbrook/Rosa Parks Light Rail Station that serves both the A Line (formerly Blue Line) and C Line (formerly Green Line) is located about 1,400 feet northeast of the TAY Drop-In Center site. In addition, numerous bus lines run along 120<sup>th</sup> Street adjacent to the TAY Drop-In Center site on the south and Wilmington Avenue about 400 feet to the east. The currently Proposed Project (but not the main MLK Campus) is within a TOD Parking Reduction Overlay Zone.

## **Willowbrook Area Access Improvements**

The Willowbrook Area Access Improvements project is located on Wilmington Avenue and 120th and 119th Streets immediately north and east of the MLK Campus (north of the main Driveway). The Willowbrook Area Access Improvements are designed to improve the mobility of pedestrians and bicyclists in the Willowbrook neighborhood adjacent to the MLK Medical Center Campus. Project improvements will include sidewalk enhancements, pavement repair, renovation of the existing landscaped median, refurbishing existing and providing new street furnishing such as bus shelters, benches, bike racks, pedestrian lighting, traffic signal upgrades, etc. These improvements will enhance access to the MLK Medical Center including the currently Proposed Project. The access improvements have been completed by the County of Los Angeles.

### **B. 2011 FEIR ASSUMPTIONS**

The 2011 FEIR evaluated two tiers of development. Tier I included vacation of approximately 509,000 square feet of space including the emergency room (3,300 square feet) and original MACC (495,335 square feet of space) and development of two buildings and ancillary structures totaling 170,000 square feet (new MACC, Ancillary Building and Central Plant). Tier I also included tenant improvements and possible relocation of the MRI building.

Tier II of the MLK Project included up to 1,814,696 square feet of development on the campus. Proposed development assumed a mix of uses, including medical office, commercial, retail, office space, recreation, and other development in support of the campus. In addition, up to 100 residential units, to be developed at a multi-family density consistent with the surrounding was assumed. Tier II was assumed to entail the reuse, replacement, or removal of the existing MACC Building, Emergency Room, Storage Building, and Cooling Towers. The 2011 FEIR indicated that sufficient parking would be provided for Tier II uses, but the location of parking was not specified in the 2011 FEIR.

The 2011 FEIR indicated that of the 38 acres (1.3 million square feet) of land on the MLK Medical Center Campus, a minimum of 10% was reserved for open space and a maximum of 40% was reserved for up to 100 residential units, walkways and parking structures and/or lots with the remainder anticipated to be occupied by medical center buildings.

The development of Tier II was assumed to use and incorporate materials to ensure visual consistency and continuity on the MLK Campus and within the surrounding area. Tier II development is required to comply with design goals presented in the campus planning and programming report that was prepared for the MLK Campus by HMC Architects in 2009. The report stated that the proposed architecture should achieve the following:

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

The 2011 FEIR evaluated building heights of up to 78 feet tall (including appurtenances).

The potential construction scenario for Tier II was envisioned as a multi-phase process. The construction scenario for Tier II was to develop all Tier II uses within an approximately 10-year timeframe, between 2010 and 2020. Tier I was completed at the end of 2013. Tier II started with the adaptive reuse of three floors of the Interns and Physicians building (completed in 2015); build out of Tier II is currently anticipated to occur in 2026 or beyond.

The 2011 FEIR indicates (page 2-26) that it is anticipated that the site Emergency Response and Evacuation plans would be updated for both Tier I and Tier II of the MLK Project as appropriate and that these plans would address all campus development, as each building is completed. The FEIR indicates (page 2-26) it is understood that communication with the County Fire Department, Sheriff's Department, and other emergency response agencies would continue throughout the development of both tiers of the MLK Project. It was further understood that the County of Los Angeles would coordinate with the respective service agencies for Tier II of the MLK Project to review the specific proposed development during the planning phase of each to confirm whether Tier II of the MLK Project adequately meets the requirements of the respective service providers.

The analysis of construction impacts was based on an aggressive scenario (allowing build out of the campus to the maximum extent possible with conservative assumptions -- i.e. it assumed the fastest possible construction and the most intense buildout scenario with respect to operation of equipment) to allow the consideration of a conservative environmental impact scenario, which encompasses the maximum anticipated impacts of the MLK Project, in the event that the County chooses to complete up to 1,814,696 square feet of development. The type and quantity of equipment that would potentially be used in construction of Tier II was anticipated to vary for each component. For the purposes of the analysis in the 2011 FEIR, it was anticipated that development of Tier II would require multiple phases that would use equipment comparable to that shown in **Table 3**, below.

**Table 3**  
**Anticipated Construction Equipment for Redevelopment Project**

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

*Source: MLK Medical Center Campus Redevelopment, Mitigation Monitoring Program (Table II.2-1 page II-6); February 2011*

Site preparation and construction is required to be in accordance with all federal, state, and county building codes. The 2011 FEIR anticipated that for Tier I alone, excavation of up to 40,000 cubic yards of dirt to a depth of up to 45 feet. Daily construction activities are subject to County noise regulations.

All construction-related activities are required to be scheduled in compliance with the County Noise Ordinance, which prohibits construction activities and operation of construction equipment between the hours of 8:00 p.m. and 7:00 a.m., Monday through Friday, or at any time on Sunday or holidays. Work conducted on Saturdays must not commence before 7:00 a.m. and must end no later than 5:00 p.m. Noise levels exceeding 65 dBA (decibels, A-weighted sound levels) for single-family residences and 70 dBA for multifamily residences during construction hours are prohibited.

All construction contractors are required to ensure that source-reduction techniques and the development of recycling programs during construction and operation of the MLK Project are considered and implemented whenever possible. The construction contractor is also required to incorporate BMPs consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. BMPs to control surface runoff and soil erosion are required for construction taking place during rainy periods. Construction equipment used during the development of Tier II is

required to be turned off when not in use to reduce idling to the maximum extent possible. The construction contractor is required to ensure that all construction and grading equipment is properly maintained. All vehicles and compressors are required to be equipped with exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times.

It was anticipated that on average, up to 400 construction workers would be working at any given time during the construction of Tier II projects. In addition, approximately 60 County project and construction management staff are assumed to be at the site during Tier II construction. However, it was indicated this number could vary as a result of the type and/or amount of work being completed on-site. Construction-related ingress and egress to the project site was assumed to occur primarily off East 120th Street or Wilmington Avenue.

Construction worker activity would continue to vary by phase; across all future development anticipated to occur in connection with the MLK Project, the 2011 FEIR assumptions regarding workers on site would continue to be appropriate. Primary construction access for the proposed TAY Drop-In Center would be from 120<sup>th</sup> Street and Holmes Avenue. Primary access for construction of the adjacent North Parking Structure that may occur at the same time as the TAY Droop-In Center, would be from Wilmington Avenue, 118<sup>th</sup> Street, Homes Avenue and/or 120<sup>th</sup> Street.

## C. CURRENTLY PROPOSED PROJECT -- TAY DROP-IN CENTER

### Oasis Clinic

The TAY Drop-In Center would be square rather than rectangular but generally constructed in the same location as the existing Oasis Clinic building. The Oasis Clinic building is an approximately 6,000 square foot modular one-story building (see **Figure 5**) that was constructed in about 2003. While the Oasis Clinic building is currently vacant it provided Outpatient HIV/AIDS medical care and case management services until June 2023. These services were relocated to other areas of the MLK Campus including the Outpatient Center.

### TAY Drop-In Center Project Characteristics

The County is proposing to construct a two-story, approximately 9,345-square-foot youth wellness building to house the MLK TAY Drop-In Center. The TAY Drop-In Center is currently in the initial planning phase; a site plan and building plans have not yet been prepared.



SOURCE: Impact Sciences, 2024.

FIGURE 5

The TAY Drop-In Center would provide temporary safety and basic support for Transitional-Age-Youth (TAY) between the ages of 18-25 years old. The TAY Drop-In Center would provide clinical services to local youth on their own terms, including mental health, physical health, substance use prevention, as well as supported education and employment, and peer and family support.

TAY generally refers to young adults, some of whom are exiting the foster care system, many of whom are experiencing homelessness or are at risk for homelessness, and face a number of challenges, including lack of access to housing, employment, and healthcare. They are also more likely to experience mental health and substance abuse problems. TAY Drop-In Center services are tailored to the local population and include, but are not limited to the following:

- Clothing
- Computer/Internet Access
- DVDs and Games
- Educational Services
- Employment Assistance
- Housing Assistance
- Linkage to Mental Health & Case Management Services
- Linkage to Substance Abuse Treatment Services
- Café/Meals
- Peer Support Groups
- Showers
- Laundry facilities
- Social activities
- HIV/STI Testing

The building would include work rooms, large group rooms, offices, intake rooms, chat rooms, a café, showers, laundry facilities, and common areas including possibly a terrace and/or an interior atrium open space.

## **Lighting**

In accordance with adopted Mitigation Measure Aesthetics-1, all exterior lighting for building and on-site security lighting would be shielded and directed downwards to minimize the impacts on the surrounding land uses. Lighting would be similar to lighting of other MLK and CDU buildings.

## **Days and Hours of Operation, Staffing and Clients**

The TAY Drop-In Center would be open generally 1 pm through 8 pm, or to 10 pm if needed Monday through Saturday. The facility would have 10 employees from 1 pm to 3 pm with an additional 5 employees from 3 pm to 8 pm (or 10 pm if needed) for a total of approximately 15 employees per day. Staffing is anticipated to include office hours for physicians and councilors already located on the MLK Campus. The County anticipates that the TAY Drop-In Center will serve approximately 25 clients per day.

## Demolition and Construction Activities

Project demolition and construction activities would be typical of such activities and would be well within the assumptions made in the 2011 FEIR (as identified in **Table 3** above).

The Mitigation Monitoring Program indicates that Tier II would require multiple phases and would require use of equipment comparable to the equipment identified in **Table 3** above. Excavation is anticipated to extend about four feet below the ground surface.

As noted in the 2011 FEIR, construction is not allowed between 8:00 pm and 7:00 am Monday through Friday or anytime on Sunday. Saturday construction could occur between 7:00 am and 5:00 pm. Duration of all the main currently reasonably foreseeable construction activities associated with the MLK Project as well as another nearby project at the Charles Drew University is discussed below.

## Schedule

Construction of the TAY Drop-In Center would require approximately 18 months, including about four months for demolition of the Oasis Clinic Building, two months for site preparation and about 12 months for building construction, architectural coating and any paving. A 6-month gap is allotted for the temporary use of the site after demolition of Oasis Clinic prior to start of construction. Occupancy is expected to occur in 2027.

Construction of the TAY Drop-In Center could overlap with construction of the following projects that are part of the overall MLK Project evaluated in the 2011 FEIR:

- Construction of the approximately 300-space North Parking Structure immediately north of the TAY Drop-In Center site is anticipated to require approximately 11 months for construction (three months for site preparation, grading and foundations and eight months for building construction, architectural coatings and paving). This North Parking Structure construction is anticipated to start in mid-2025 and to begin operation in late 2026/early 2027.
- Demolition of the Hawkins Building would take approximately eight months and is scheduled to be completed by 2026 (across 120<sup>th</sup> Street, about 380 feet southwest of the TAY Drop-In Center site).

In addition, the following project may be under construction on the CDU campus:

- Construction of a five-story, 92,618-square-foot Health Professions Education Building (HPEB) about 1,000 feet west of the TAY Drop-In Center site. The HPEB was approved December 6, 2022, and at that time construction was anticipated to begin in 2023 and last for two years.

In early 2021 the 100-unit five story Springhaven Apartment building (11815 Wilmington Avenue) was completed immediately to the east of the North Parking Structure site (it is set back about five feet from the property line). This building has 49 general affordable units, 50 special needs units and one manager's unit.

### **Discretionary Actions and Approvals**

The development of the currently Proposed Project (TAY Drop-In Center) requires approval by the County.

### **Project Objectives**

Project objectives identified in the 2011 FEIR remain relevant and applicable to the currently Proposed Project (TAY Drop-In Center). The objectives for Tier II include:

- Provide opportunities for development of up to 1,814,696 square feet of mixed use, including medical office, commercial, retail, residential, recreational, office space, and other development in support of the campus that are appurtenant to and compatible with the primary land use of a community-based health program facility.
- Provide sufficient parking for mixed-use development.

### 3. ENVIRONMENTAL SETTING & IMPACT ANALYSIS

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The certified Final EIR for the Martin Luther King Jr. Medical Center Campus Redevelopment Project (2011 FEIR) and the associated Findings of Fact and Statement of Overriding Considerations determined that the proposed redevelopment of the campus (Tier II, of which the project is a part) would result in significant and unavoidable impacts in the issue areas identified below. The following discussion also compares impacts of the currently Proposed Project to the conclusions of the 2011 FEIR.

- **Air Quality.** Section 3.02, *Air Quality*, of the 2011 FEIR identified and evaluated the anticipated Tier II significant impacts related to air quality. Implementation of mitigation measures Air-1 to Air-11 (as well as applicable mitigation measures from the 2018 Willowbrook FEIR – AIR-1 to AIR-7) would be expected to reduce air emissions to the maximum extent feasible; however, the 2011 FEIR indicates that impacts would remain significant with respect to air emission standards, sensitive receptors, and cumulative impacts during construction and operation.

*Construction:* Emissions could exceed regional daily thresholds for VOCs and NO<sub>x</sub> and localized thresholds for NO<sub>x</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> -- based on assumed equipment use and distance to sensitive receptors.

*Operations:* Emissions would exceed regional daily thresholds for VOCs, NO<sub>x</sub>, CO and PM<sub>10</sub>.

Since certification of the 2011 FEIR emissions controls have substantially reduced emissions associated with both construction and operation. However, for purposes of this addendum impacts are evaluated based on the 2011 FEIR data. Construction of the currently Proposed Project together with construction activities of other nearby projects (in particular the North Parking Structure proposed immediately north of the TAY Drop-In Center site that may overlap in construction) would result in peak daily emissions within those analyzed in the 2011 FEIR. Conservatively impacts are considered to remain significant. The TAY Drop-In Center would not result in a net increase in trips and therefore trips generated by the currently Proposed Project would be within the trip generation analyzed in the 2011 FEIR. Nonetheless, conservatively, impacts of redevelopment of the overall MLK Campus are considered to continue to result in a significant impact to air quality.

- **Cultural Resources.** Section 3.03, *Cultural Resources*, of the 2011 FEIR identified and evaluated the anticipated Tier II significant impacts related to cultural resources. Implementation of mitigation measures Cultural-3 to Cultural-5 (and CUL-4 from the 2018 Willowbrook FEIR) would be expected to reduce significant impacts related to the alteration or removal of structures or character-defining features that may be identified as historic resources; mitigation measures also address excavation in previously undisturbed soils that may result in the discovery of archaeological and/or paleontological

resources or human remains. The 2011 FEIR indicates that impacts to historic resources would remain significant and adverse even after mitigation.

Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium (Hudson Auditorium) as a result of implementation of Tier II. The demolition/removal of these historical resources was identified as a significant and unavoidable impact. The existing Oasis Clinic is a modular building north of the main MLK Campus. The currently Proposed Project (TAY Drop-In Center requiring removal of the modular Oasis Clinic) would not impact historic resources.

- **Greenhouse Gases.** Section 3.05, Greenhouse Gas Emissions, of the 2011 FEIR identified and evaluated the anticipated Tier II significant impacts related to greenhouse gas emissions. Implementation of mitigation measure Greenhouse Gases-1 would be expected to reduce significant direct, indirect, and cumulative impacts to greenhouse gas emissions to the maximum extent feasible. However, emissions could still remain a significant adverse impact.

Potential GHG emission impacts associated with construction and operation of Tier II would be significant and unavoidable; the currently Proposed Project would contribute to GHG emissions for the MLK Campus as a whole on completion of all redevelopment analyzed in the 2011 FEIR resulting in a significant impact.

- **Construction Noise.** Section 3.08, Noise, of the 2011 FEIR identified and evaluated the anticipated Tier II significant impacts related to noise. Implementation of mitigation measures Noise-1 to Noise-3 (as well as applicable mitigation from the 2018 Willowbrook FEIR – NOI-3) would be expected to reduce significant temporary increases in noise levels that could exceed established thresholds during construction of the project to the maximum extent feasible. However, the noise related impacts conservatively are considered to remain a significant adverse impact.

The 2011 FEIR indicates that construction noise levels would exceed the 75 dBA threshold level at residences that are within 80 feet of construction activities. While there are no residences located within 80 feet of the TAY Drop-In Center site, construction of the North Parking Structure, immediately north of the TAY Drop-In Center site, may occur at the same time and so the two projects are considered together in the evaluation of noise impacts. The North Parking Structure site is adjacent to a five-story apartment building and construction activities would occur approximately 50 feet from the apartment building and 50 feet from single-family homes to the north of 118<sup>th</sup> Street. As discussed in the 2011 FEIR, construction noise impacts would be significant and unavoidable at residences within 80 feet.

The Statement of Overriding considerations indicates:

*The County Board of Supervisors determined that the social and community relevance, economic potential, educational opportunities, sustainable facilities, and health care needs related benefits of implementing the project, when balanced against all adverse effects, outweigh and override the unavoidable adverse effects of the project and cause those effects remaining after mitigation to be acceptable due to several considerations. Furthermore, the project offers significant opportunities and benefits that are not currently accessible or available in the surrounding community.*

These overriding considerations are applicable to the currently Proposed Project as the facilities would continue to meet healthcare needs of the community and provide educational opportunities and benefits in sustainable facilities. All remaining impacts were found to be less than significant with mitigation incorporated, less than significant or no impact.

As documented in the analyses below and summarized in **Table 4** below, with the mitigation measures previously adopted with the 2011 FEIR, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur as a result of the currently Proposed Project. Accordingly, the following discussion supports the County’s conclusion, pursuant to *State CEQA Guidelines* Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

**Table 4**  
**Summary of Impacts -- 2011 FEIR Compared to Impacts of the Currently Proposed Project**

<b>Impact</b>	<b>2011 FEIR Level of Significance</b>	<b>Currently Proposed Project</b>
<b>Aesthetics</b>		
Scenic Vistas and scenic resources.	<i>Less than significant.</i> There are no scenic vistas or scenic resources in the project area.	<i>Less than significant.</i> There continue to be no scenic vistas or scenic resources.
Degradation of visual character; or increases in shading of sensitive uses.	<i>Less than significant with mitigation.</i> Based on height not exceeding 78 feet, assumed setbacks and mitigation measures.	<i>Less than significant with mitigation.</i> The proposed structure would comply with all mitigation measures from the 2011 FEIR and would not result in a significant impact to visual character.
New sources of light and glare.	<i>Less than significant with mitigation.</i> Based on conceptual height (maximum of 78 feet in this location), setback and mitigation measures.	<i>Less than significant with mitigation.</i> The currently Proposed Project would be required to comply with mitigation measures identified in the 2011 FEIR that would reduce impacts from light and glare to a less than significant level.
<b>Agricultural and Forest Resources</b>		
There are no agricultural or forest resources on-site.	<i>No impact.</i> This issue was dismissed in the 2011 FEIR Initial Study.	<i>No Impact.</i> There are no agricultural or forest resources in the project vicinity.

Impact	2011 FEIR Level of Significance	Currently Proposed Project
<b>Air Quality</b>		
Obstruct Implementation of Air Quality Plan, air emissions during construction and operation and sensitive receptors.	<i>Significant.</i> For both construction and operation. Construction: Emissions would exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors. Operation: Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10.	<i>Significant.</i> Demolition of the existing Oasis Clinic building, and subsequent site clearing, and construction activities would involve use of equipment resulting in emissions no greater than assumed in the 2011 FEIR. Increasingly stringent required emissions controls continue to result in reduced air emissions from construction and operation activities. Cumulative construction air quality impacts could occur at the apartment building about 140 feet northeast of the TAY Drop-In Center site. Overall impacts for all Tier II development would be similar to or more likely (as a result on increasingly stringent emission controls) less than was analyzed in the 2011 FEIR. Adopted mitigation measures would continue to reduce impacts but possibly not below a level of significance. While there would be no net increase in trips from the currently Proposed Project, on completion of Tier II, emissions could still exceed SCAQMD thresholds.
Odors	<i>Less than significant impact.</i> Minor odors during construction. Hospital uses not a land use identified as associated with odors.	<i>Less than significant impact.</i> Impacts the same as in the 2011 FEIR.
<b>Biological Resources</b>		
Habitat, protected species, riparian areas, wetlands, migratory species, local policies.	<i>No impact.</i> Minimal biological resources present on the campus; compliance with existing regulations is required. This issue was dismissed in the 2011 FEIR Initial Study.	<i>No impact.</i> There are six ornamental trees located in the parking area of the TAY Drop-In Center site as well as minor ornamental vegetation. The County must comply with Migratory Birds Treaty Act to protect nesting birds.
<b>Cultural Resources</b>		
Historic Resources (historic district and several historic buildings on the MLK Campus).	<i>Significant.</i> The 2011 FEIR analyzed and provided mitigation measures for demolition of all historic resources on the campus. The 2011 FEIR indicated that some buildings may be retained but it evaluated the potential for demolition of all of them. Demolition/removal of each of the following was identified as resulting in a significant and unavoidable impact: Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium.	<i>No impact.</i> The currently Proposed Project would result in the removal of the Oasis Clinic a modular structure that was constructed in about the year 2003 and is not historic.
Archaeological resources, and human remains impacts.	<i>Less than significant with mitigation.</i> Mitigation would reduce potential impacts to a less than significant level.	<i>Less than significant with mitigation.</i> Mitigation as applicable would continue to reduce potential impacts to a less than significant level.

3. Environmental Setting & Impact Analysis

Impact	2011 FEIR Level of Significance	Currently Proposed Project
<b>Energy</b>		
Wasteful, inefficient or unnecessary energy consumption.	<i>Less than significant impact.</i> The 2011 FEIR addressed energy in the analysis of Greenhouse Gas Emissions. As an essential use, medical facilities would not be wasteful or inefficient. Further compliance with Title 24's energy conservation standards for new construction would help to offset increases.	<i>Less than significant impact.</i> The currently Proposed Project would comply with Title 24 and would not result in wasteful or inefficient use of energy
<b>Geology and Soils</b>		
Expose people or structures to risks as a result of seismic hazards; unstable or expansive soils, soil erosion, septic systems.	<i>Less than significant with mitigation.</i> As a result of compliance with existing regulations and mitigation.	<i>Less than significant with mitigation.</i> Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures.
Paleontological Resources. (addressed under Cultural Resources in the 2011 FEIR)	<i>Less than significant with mitigation.</i> Identified mitigation measures would reduce potential impacts to less than significant level.	<i>Less than significant with mitigation.</i> Excavation depth is less than maximum in 2011 FEIR; identified mitigation measures would continue to reduce potential impacts to less than significant level.
<b>Greenhouse Gas Emissions</b>		
Generate emissions that would exceed a threshold; consistency with applicable plans.	<i>Significant.</i> The FEIR identified GHG emissions as a result of operational activities to be significant due to building sizes and anticipated vehicle trips.	<i>Significant.</i> The currently Proposed Project would be an integral part of the overall MLK Campus Redevelopment Plan analyzed in the 2011 FEIR. It would be part of the anticipated significant increase in GHG emissions. Increased use of the nearby transit (Willowbrook/ Rosa Parks Metro Station) could result in fewer emissions than previously identified.
<b>Hazards and Hazardous Materials</b>		
Routine transport, use or disposal. Hazardous materials within ¼ mile of a school, upset and accident. Hazardous material site Government Code Section 65962.5.	<i>Less than significant with mitigation.</i> As a result of previous use of the site hazardous materials may be encountered and mitigation would be implemented as appropriate.	<i>Less than Significant with Mitigation.</i> Compliance with existing regulations and mitigation measures would result in impacts being similar impacts to 2011 FEIR.
Proximity to aviation facilities, interfere with emergency response.	<i>Less than significant impact.</i> Closest airport is in the City of Compton 2.1 miles to the south. The project would not interfere with an emergency response plan, it would improve conditions related to healthcare.	<i>Less than significant impact.</i> Impacts the same as in the 2011 FEIR.
<b>Hydrology and Water Quality</b>		
Violate water quality standards, impact groundwater, substantially degrade groundwater.	<i>Less than significant with mitigation.</i> Significant impacts could result from increases in impervious surfaces and urban pollutants, compliance with mitigation measures would reduce impacts to a less than significant level.	<i>Less than significant with mitigation.</i> The currently Proposed Project would not increase impervious surfaces and would be required to comply with existing regulations and the mitigation measures in the 2011 FEIR with respect to water quality.
Alter drainage patterns, create runoff that exceeds capacity of stormwater drainage. Alter the course of a stream or river.	<i>Less than significant impact.</i> The project would not substantially alter drainage patterns and would not alter the course of a stream or river.	<i>Less than significant impact.</i> Impacts the same as in the 2011 FEIR.
Impacted by flooding, seiche, tsunami; risk of release of pollutants.	<i>Less than significant impact.</i> The project area is not within a 100-year or 500-year flood zone, not located in proximity to a large body of water and is 10 miles from the ocean.	<i>Less than significant impact.</i> Impacts the same as in the 2011 FEIR.

3. Environmental Setting & Impact Analysis

Impact	2011 FEIR Level of Significance	Currently Proposed Project
<b>Land Use and Planning</b>		
Potential to divide a community and consistency with applicable plans.	<i>No impact.</i> This issue was dismissed in the 2011 FEIR Initial Study because the proposed redevelopment of the MLK Campus would be continuation of an existing use.	<i>No impact.</i> The currently Proposed Project represents an intensification of uses that already exist in the same location as they currently exist.
<b>Mineral Resources</b>		
Loss of mineral resources.	<i>No impact.</i> Since there are no mineral resources known to exist on the MLK Medical Center Campus. This issue was dismissed in the 2011 FEIR Initial Study.	<i>No impact.</i> No mineral resources are known to exist in the vicinity of the MLK Medical Center Campus.
<b>Noise</b>		
Construction noise and vibration impacts to adjacent uses.	<i>Significant.</i> Based on anticipated construction equipment and distance to sensitive receptors (within 80 feet). Mitigation would reduce noise but not below a level of significance.	<i>Significant.</i> Demolition, site preparation, grading and construction activities would occur similar to those described in the 2011 FEIR. The 2011 FEIR evaluated construction noise impacts at similar distances to sensitive receptors as would be impacted with the currently Proposed Project and cumulative development. Construction activities at the parking structure north of the TAY Drop-In Center site would be about 50 feet from a five-story apartment building to the east and single-family homes located north across E. 118 <sup>th</sup> Street. As indicated in the 2011 FEIR residential uses (and other sensitive uses) within 80 feet of construction activities could experience noise levels above the 75 dBA threshold. Adopted mitigation measures would continue to reduce impacts but potentially not below a level of significance due to proximity of cumulative projects to residential uses.
Operational noise and vibration from equipment and vehicles.	<i>Less than significant impact.</i> As a result of increased vehicle trips operational noise would increase but by a less than significant amount.	<i>Less than significant impact.</i> The currently Proposed Project would not result in a net increase in trips. Buildout of the overall MLK Project would continue to result in operational noise the same or less than was analyzed in the 2011 FEIR.
Located near airport or airstrip.	<i>Less than significant impact.</i> The project site is more than 2 miles from the closest airport or airstrip and would not be substantially affected by aviation-related noise.	<i>Less than significant impact.</i> Impacts the same as in the 2011 FEIR.
<b>Population and Housing</b>		
Induce population growth displace housing or people.	<i>Less than significant.</i> Jobs would be created during construction and operation. These jobs are anticipated to be filled with workers from the surrounding community. No housing displaced.	<i>Less than significant.</i> The currently Proposed Project would create construction jobs and would not displace housing. The TAY Drop-In Center could also create jobs, but within the overall total anticipated for the MLK Campus and associated operations.
<b>Public Services</b>		
Impacts to emergency services, police services, schools, parks and other public services/libraries.	<i>Less than significant.</i> Based on size of proposed development and increased vehicle trips, the 2011 FEIR concludes impacts to Public Services would be less than significant.	<i>Less than significant.</i> The currently Proposed Project would not increase vehicle trips or result in a substantial increase in demand for public services as a result of increased development. Impacts would be within impacts analyzed in the 2011 FEIR.

Impact	2011 FEIR Level of Significance	Currently Proposed Project
<b>Recreation</b>		
Impact on existing recreational facilities., require construction of new facilities	<i>Less than significant.</i> Based on limited potential for increased population, approximately 400 construction jobs and net new 100 new permanent jobs.	<i>Less than significant.</i> The currently Proposed Project would have open space/lounge areas for the clients, staff and visitors, and would not generate impacts on recreational facilities.
<b>Tribal Cultural Resources</b>		
Result in a substantial adverse impact to a tribal cultural resource	<i>Less than significant impact with mitigation.</i> The 2011 FEIR addressed impacts to Tribal Cultural Resources with archaeological resources under Cultural Resources above.	<i>Less than significant impact with mitigation.</i> See archaeological resource discussion above.
<b>Transportation and Traffic</b>		
Traffic impacts during construction and operation.	<i>Less than significant with mitigation.</i> Based on vehicle trips that would be generated by developed area and required mitigation measures.	<i>Less than significant with mitigation.</i> The currently Proposed Project together with Tier II development undertaken so far would not trigger any significant impacts. Impacts would be within those analyzed in the 2011 FEIR. The County would contribute fair share costs to mitigation measures affected by cumulative development. As Tier II continues to build out mitigation measures will be implemented as appropriate consistent with CEQA requirements and County policies.
Conflict with plan addressing circulation, including transit, bicycle and pedestrian facilities. Increase hazards due to geometric design. Result in inadequate emergency access.	<i>Less than significant impact.</i> The MLK Project is in close proximity to transit and provides an essential public service. The MLK Project would not increase hazards due to a geometric design. The MLK Project would not result in inadequate emergency access.	<i>Less than significant impact.</i> The currently Proposed Project would provide a public wellness service in proximity to transit. It would not affect the geometric design of roadways and would not result in inadequate emergency access.
<b>Utilities and Service Systems</b>		
Impacts to wastewater, water, storm water and solid waste.	<i>Less than significant with mitigation.</i> Based on developed area and required mitigation measures, the 2011 FEIR concludes less than significant impact.	<i>Less than significant with mitigation.</i> The currently Proposed Project would be within the development assumptions for the MLK Campus and Willowbrook TOD Specific Planning area. Impacts would be within those identified in the 2011 FEIR.
Impacts to electrical and natural gas facilities. Sufficient water supplies.	<i>Less than significant impact.</i> Project energy and water demands would be consistent with supplier forecasts and would result in a less than significant impact.	<i>Less than significant impact.</i> The currently Proposed project is within supplier forecasts.
<b>Wildfire</b>		
Impair emergency response, exacerbate risks, require installation of infrastructure, expose people or structures to risks including downslope flooding or landslides as a result of post-wildfire conditions	<i>No impact.</i> The project site is located in a developed area and is not adjacent to wildlands, nor is it in or near areas designated as a Very High Fire Hazard Severity Zone. Therefore, no impacts would occur.	<i>No impact.</i> The project site is not located near wildland areas or a Very High Fire Severity zone.

**A. AESTHETICS**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to the 2011 FEIR analysis, the 2018 Willowbrook FEIR and required mitigation contained in the 2011 FEIR. The TAY Drop-In Center site is within 0.5 miles of a major transit stop and in accordance with CEQA Section 21099(d)(1)), “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR indicates that the MLK Campus is not within a scenic vista, and there are no scenic vistas identified within the vicinity. Existing development on the campus consists of the Martin Luther King, Jr. Medical Center, which provides medical services to the South Los Angeles community. Existing development to the north includes the Charles Drew University. The 2011 FEIR concluded no impacts to scenic vistas.

The 2018 Willowbrook FEIR, that found less than significant impacts to aesthetics, indicates:

*The proposed project would result in redevelopment and infill development within the existing developed urban environment. The views along roadway corridors would continue to be of a developed and urban landscape. Due to the relatively flat terrain and the existing structural development throughout the project site, no identified or designated scenic views or vistas exist; thus none would be impacted by redevelopment and infill development within the Specific Plan area. As a result, implementation of the proposed Specific Plan would not result in impacts to a scenic vista.*

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would replace a one-story approximately 6,000 square foot building with a two-story approximately 9,345 square foot building. The currently Proposed Project would be within the development assumptions analyzed in the 2011 FEIR and 2018 Willowbrook FEIR. The TAY Drop-In Center is in an urban setting and would be similar or smaller scale and similar in use. Public facilities, commercial development, and residential development -- all of which are typical of an urban setting -- comprise the land uses surrounding the location of the proposed buildings. Consistent with the analysis and conclusions of the 2011 FEIR, the currently Proposed Project, would not impact scenic vistas. There would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concluded no impacts to scenic resources within a state scenic highway.

The 2018 Willowbrook FEIR indicates:

*Interstate Highway 105 runs east to west along the northern portion of the project area but is not designated as a scenic highway. The nearest Caltrans-designated Scenic Highway is a portion of Highway 210 located approximately 20 miles north of the Specific Plan area. Thus, the Specific Plan area is not visible from this highway, and the project would not result in impacts to scenic resources within view of a state scenic highway."*

## Currently Proposed Project

### *Construction and Operation*

As noted in the 2011 FEIR and 2018 Willowbrook FEIR the project area is far from state designated highways. The currently Proposed Project site cannot be viewed from a scenic highway due to distance. The distance from the scenic route and the site’s overall flat topography would result in no impact to public views. (The 2011 FEIR analyzed a maximum height of 78 feet.) The currently Proposed Project would not result in new or greater impacts in relation to scenic resources within a state scenic highway. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

As described in the 2011 FEIR, the buildings on the MLK Campus range in height from one to six stories. Buildings surrounding the currently Proposed Project include structures associated with the Charles Drew University and adjacent residential development. Structures range in height from 1 to 5 stories. The area surrounding the MLK Campus is characterized by common urban development, where land uses include public facilities, commercial development, and residential development. The 2011 FEIR concluded less than significant impacts with mitigation (Mitigation Measures Aesthetics-1 through Aesthetics-4).

The 2018 Willowbrook FEIR, indicates that the Specific Plan would enhance, not degrade, the visual character and quality of the area. Therefore, less than significant impacts relating to the existing visual character or quality of the area would occur.

**Currently Proposed Project**

***Construction and Operation***

The currently Proposed Project would be consistent with the Specific Plan and would be consistent in character with surrounding development. The height of the proposed building would be approximately 45 feet or less. The project would result in new development consistent in appearance and use with surrounding structures, therefore, impacts to visual character and quality would be less than significant consistent with the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

***Construction and Operation***

The 2011 FEIR indicates that the existing campus includes security, landscape and perimeter lighting on the site and adjacent properties, including streetlights along major thoroughfares and the emergency access roadway. The 2011 FEIR concludes a less than significant impact with mitigation with respect to light and glare and nighttime views (Mitigation Measures Aesthetics-1 through Aesthetics-4).

The 2018 Willowbrook FEIR indicates that:

*Furthermore, the proposed Specific Plan includes Performance Standards to ensure that sensitive uses are not adversely impacted by adjacent development. The Light and Glare Performance Standard states that all outdoor lighting shall be designated to minimize light trespass; that existing residential uses should be buffered from light and glare effects from new development; and that site, parking lot and building security lighting shall not impact surrounding properties.*

*In regard to glare, implementation of the Specific Plan would also not result in a substantial increase in daytime glare. The land uses that would be developed within the Specific Plan would be typical institutional, commercial, residential, and mixed-use structures. Typically, these structures would be designed with non-reflective textured surfaces on building exteriors (such as stucco, brick, stone, wood). Windows that are included as part of the design of the building exteriors would be required to be in compliance with Section 22.44.1320 (Construction Colors, Materials, and Design) of the*

County Code that requires windows to be comprised of non- glare/non-reflective glass. In addition, the Performance Standards included in the proposed Specific Plan require that new development preclude generation of direct glare by ensuring that no surfaces reflect direct glare onto adjoining property, streets, or skyward.

**Currently Proposed Project**

**Construction and Operation**

In accordance with Mitigation Measure Aesthetics-1, all exterior lighting for building and on-site security lighting would be shielded and directed downwards to minimize the impacts on the surrounding land uses. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

**B. AGRICULTURAL AND FOREST RESOURCES**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to agricultural and forest resources compared to the 2011 FEIR was evaluated in relation to the 2011 FEIR, the 2018 Willowbrook FEIR and five questions recommended for consideration by the *State CEQA Guidelines*.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR concluded no impacts to agricultural and forest resources as there are no such resources in the vicinity of the project site. The project site is located in an urban area. There is no farmland, timberland or forest located on the project site or in the vicinity. The project area does not contain farmland or agricultural uses, nor are any such lands located within close proximity to the MLK Campus such that the MLK Project could potentially create indirect impacts.

**Currently Proposed Project**

*Construction and Operation*

The currently Proposed Project would continue to have no impact with respect to agricultural and forest resources, consistent with the analysis and conclusions in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

**C. AIR QUALITY**

Air quality impacts of the currently Proposed Project were evaluated with regard to the 2011 FEIR and the 2018 Willowbrook FEIR. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to air quality than analyzed in the 2011 FEIR was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR determined that development of the proposed MLK Project was within the Southern California Association of Governments (SCAG) forecast for the area and would therefore be consistent with

growth assumptions included within the most recent AQMP. As indicated in the 2011 FEIR, the proposed Tier II development (of which the currently Proposed Project would be an integral part) would result in significant construction and operational impacts associated with emissions of criteria pollutants (see below).

The 2018 Willowbrook FEIR indicates:

*The Specific Plan implements infill development, located in an urbanized area with existing infrastructure, near a transit line. Thus, the Specific Plan would support AQMP objectives to reduce trips, and would aid in the implementation of the AQMP. In addition, the employment generating uses that would be implemented with the Specific Plan would provide new employment opportunities for residents that could reduce regional commute trips.*

However, the Specific Plan increased residential and non-residential area above that forecast by SCAG and therefore the 2018 Willowbrook FEIR found the Specific Plan would have a significant impact related to implementation of the AQMP.

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would be within the assumptions made in the 2011 FEIR and the 2018 Willowbrook FEIR and would not result in additional residential or non-residential floor area as compared to the overall Tier II MLK Project and therefore would not contribute to a significant impact with respect to the AQMP. However, the TAY Drop-In Center as part of Tier II development would contribute to significant impacts to air quality during construction and operation that were identified in the 2011 FEIR. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction*

The 2011 FEIR indicates that Mitigation Measure Air-9 would ensure that criteria pollutants emissions associated with the use of construction equipment would be reduced to the maximum extent feasible. However, VOCs and NO<sub>x</sub> emissions during construction could still exceed regional daily thresholds and could result in temporary significant and unavoidable impacts. Mitigation Measures Air-1 through Air-9 would ensure that air quality impacts on sensitive receptors during construction would be reduced to the maximum extent feasible. However, construction of Tier II buildings (that would include the currently Proposed Project) would still have the potential to exceed thresholds and result in significant impacts to sensitive receptors related to emissions of NO<sub>x</sub>, PM 10 and PM2.5.

The 2018 Willowbrook FEIR indicates that construction within the Specific Plan area could result in significant impacts to air quality as a result of contribution to regional emissions of VOCs, CO and NO<sub>x</sub> and to localized emissions of NO<sub>x</sub>, PM10 and PM2.5. The 2018 Willowbrook FEIR identifies mitigation measures (see **Table 1** above) that would reduce but not eliminate the significant impacts.

### *Operation*

The 2011 FEIR indicated that there are no feasible mitigation measures for operation of Tier II and therefore, criteria pollutant emissions from mobile sources on completion of Tier II would exceed daily regional emissions thresholds and would remain significant for VOCs, NO<sub>x</sub>, CO and PM10.

The 2018 Willowbrook FEIR indicates that operation would result in significant impacts to air quality as a result of contribution to regional emissions of VOCs, CO, NO<sub>x</sub>, PM10 and PM2.5. The 2018 Willowbrook FEIR identifies mitigation measures (see **Table 1** above) that would reduce but not eliminate the significant impacts.

## Currently Proposed Project

### *Construction*

The currently Proposed Project is relatively small, emission controls since certification of the 2011 FEIR continue to become increasingly stringent, and emissions for the TAY Drop-In Center alone are anticipated to be below thresholds, but as a component of the MLK Tier II Project, all Tier II construction occurring simultaneously is conservatively considered to still be significant.

**Operation**

The currently Proposed Project would not increase the number of trips compared to existing conditions identified in the 2011 FEIR. However, the project would be a part of the MLK Project as a whole and therefore would be a component of the impacts identified in the 2011 FEIR. The currently Proposed Project would be within the assumptions made in the 2011 FEIR and would not result in any additional air quality impacts. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

**Construction**

The 2011 FEIR analyzed development in proximity to a number of sensitive receptors including single-family development. The 2011 FEIR found that adjacent sensitive receptors would be exposed to NOx, PM10 and PM2.5 above the level of significance even after implementation of Mitigation Measures Air-1 through Air-9.

The 2018 Willowbrook FEIR indicates:

*Construction activities would take place intermittently as various development projects occur within the Specific Plan area throughout the 20-year build out period. Because development projects would be short-term and scattered throughout the Specific Plan area, sensitive receptors would be exposed for short-term limited time during nearby construction activities, but would not be exposed to construction emissions over the entire construction period. Health risk is evaluated assuming a constant exposure to emissions over a 70-year lifetime, 24 hours a day, seven days a week. As the exposure to receptors would be short-term and limited during infill development activities, diesel particulate matter (DPM) impacts from construction activities would be considered less than significant.*

**Operation**

The 2011 FEIR and 2018 Willowbrook FEIR found that localized impacts as a result of operational activities would be less than significant.

**Currently Proposed Project**

**Construction**

The majority of construction activity associated with the currently Proposed Project would be set back more than 140 feet from adjacent to sensitive receptors (apartment building to the northeast). However, the currently Proposed Project could be constructed at the same time as the North Parking Structure where construction activities would be about 50 feet from the apartment building. Construction activity for the TAY Drop-In Center would be set back farther from sensitive receptors than analyzed in the 2011 FEIR, however, the North Parking Structure would be at a similar distance from sensitive receptors as the closest receptors evaluated in the 2011 FEIR. Impacts of the two projects together would be similar to or less than (as a result of increased emission controls) those evaluated in the 2011 FEIR and are considered to remain significant. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

**Operation**

Consistent with the 2011 FEIR impacts on local receptors of operation of the currently Proposed Project together with other Tier II development would continue to be less than significant and there would be no new or greater impacts than those identified in the 2011 FEIR.

<b>(d) Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect to creating objectionable odors affecting a substantial number of people?</b>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction*

The 2011 FEIR concluded less than significant impacts with mitigation with respect to odors. Consistent with the analysis in the 2011 FEIR, the currently Proposed Project would not result in unusual or objectionable odors. During demolition, construction, and paving of the site would involve application of asphalt that can produce discernible odors typical of most construction sites. In addition, use of heavy construction equipment and the application of paints and coatings can also be a source of discernible odors. Mitigation measures to reduce construction emissions would also reduce odors. Any temporary odors would be typical in an urban environment and would be short-term in nature. Therefore, they would not be considered a significant environmental impact.

### *Operation*

With respect to operation, uses that are typically considered by the SCAQMD to be a source of odor complaints (agriculture uses, food processing and chemical plants, composting refineries, landfills and other uses) are not proposed and therefore impacts were identified to be less than significant.

### **Currently Proposed Project**

The currently Proposed project would not result in new or greater impacts than those identified in the 2011 FEIR.

## **D. BIOLOGICAL RESOURCES**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to biological resources than analyzed in the 2011 FEIR was evaluated in relation to the 2018 Willowbrook FEIR and the six questions recommended for consideration by the State California Environmental Quality Act Guidelines.

<p>Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following:</p> <p>(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?</p> <p>(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p> <p>(c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p> <p>(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

As indicated in the 2011 FEIR, the MLK Campus is a hospital facility with landscaped areas, characterized by hospital and medical functions. The Oasis Clinic and associated parking area to be redeveloped as part of the currently Proposed Project is north of the Main Campus and completely developed. The 2011 FEIR concluded no impacts to biological resources.

The 2011 FEIR summarizes the California Natural Diversity Database (CNDDDB) with respect to the project site. The 2011 FEIR indicates that 18 listed species that are known to exist in the area, including 8 plant species and 10 wildlife species. Of the 18 species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts that were identified as having the potential to occur in the region of southwestern County of Los Angeles, none were determined to have the potential to occur within the project area due to lack of suitable habitat.

Due to the lack of habitats suitable to support sensitive and locally important species, the 2011 FEIR determined that locally important species are absent from the MLK Campus. Therefore, the 2011 FEIR identifies no impacts to biological resources related to sensitive species recognized by the USFWS as federal species of concern, by the California Department of Fish and Wildlife as California special concern species or locally important species afforded protection by the California Native Plant Society (CNPS).

The 2011 FEIR indicated that the MLK Medical Center Campus does not contain riparian habitat, wetlands or other sensitive natural communities. Based on the results of the review of the USGS 7.5-minute series South Gate topographic quadrangle and the National Wetlands Inventory map, no natural communities exist within the project area. No suitable habitat exists to encourage wildlife movement.

The MLK Campus has landscaping and large trees that may be suitable for nesting birds. The Hub Clinic and parking areas to be redeveloped by the currently Proposed Project has no biological resources. In removing large trees, the 2011 FEIR indicates that the County must comply with the Migratory Birds Treat Act, which prohibits destruction or removal of any active nest of a migratory bird. The 2011 FEIR indicates that the scope of the MLK Project (Tier I and Tier II) is not expected to have an effect on nesting birds in the area. Therefore, the 2011 FEIR indicates that there would be no impacts to biological resources related to impeding the use of native wildlife nursery sites.

The 2018 Willowbrook FEIR indicates:

*No candidate, sensitive, or special-status species have been identified within or in the vicinity of the Specific Plan area by the California Natural Diversity Database (CNDDDB). The proposed Specific Plan provides for infill development within an already highly disturbed urban environment. This development would not result in any direct impacts to special-status species or result in any habitat modifications that could indirectly result in a substantial adverse effect on any special-status species. Therefore, the proposed Specific Plan project would not result in impacts on species identified as candidate, sensitive, or special-status.*

...

*The proposed Specific Plan would involve infill development within an already highly disturbed urban environment and would not involve any changes or alterations to any riparian habitat or other sensitive natural community.*

...

*Overall, because the Specific Plan area does not contain nor is located in close proximity to a wetland, the proposed Specific Plan project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*

...

*The Specific Plan area is ... sufficiently removed from habitat areas such that it could not provide for the movement of any native resident or migratory fish or wildlife species, nor could it provide an established native resident or migratory wildlife corridor or contain native wildlife nursery sites.*

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would result in the same impacts as identified in the 2011 FEIR. The currently Proposed Project would include removing six ornamental trees and minor landscaped area. The County would be required to comply with regulations regarding bird and nest protection including the Migratory Birds Treaty Act.

Consistent with the 2011 FEIR, the currently Proposed Project would continue to result in no impacts to biological resources related to species listed as sensitive, locally important, rare, threatened, or endangered, nor would there be impacts to wetlands, riparian communities, wildlife nursery sites or the movement of wildlife. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concluded no impacts with respect to ordinances protecting biological resources.

The 2018 Willowbrook FEIR indicates:

*The only local policy or ordinance related to the protection of biological resources that would be applicable to the Specific Plan area is the Oak Tree Ordinance ... The proposed Specific Plan would not affect any oak trees located in the project area. Furthermore, implementation of the proposed Specific Plan would adhere to all County ordinances ... the proposed Specific Plan would not conflict with any local plans or policies protecting biological resources, and no impacts are anticipated as a result of the proposed Specific Plan.*

**Currently Proposed Project**

*Construction and Operation*

The Oasis Clinic and associated parking area has six ornamental trees and minor landscaping. Therefore, consistent with the 2011 FEIR, the currently Proposed Project would not result in conflicts with any local policies or ordinances protecting biological resources. The MLK Project (including the currently Proposed Project) would not interfere with or impact biological resources. Therefore, there would be no impacts to biological resources related to conflicts with any local policies or ordinances protecting biological resources. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

As indicated in the 2011 FEIR, the CDFW’s National Community Conservation Planning (NCCP) program, the only NCCP region within the County is the Palos Verdes Peninsula NCCP. There are no proposed or adopted NCCPs or Habitat Conservation Plans (HCPs) that apply to the project site. The 2011 FEIR concluded no impact with respect to adopted approved conservation plans.

**Currently Proposed Project**

*Construction and Operation*

The currently Proposed Project would not result in any impacts to NCCPs or HCPs and therefore impacts would be the same as those identified in the 2011 FEIR.

## E. CULTURAL RESOURCES

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the 2011 FEIR, the 2018 Willowbrook FEIR and four questions recommended for consideration by the State CEQA Guidelines.

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

### 2011 FEIR and 2018 Willowbrook FEIR

#### *Construction and Operation*

Five historical resources, the Martin Luther King, Jr. Medical Center Campus Historic District and four contributing buildings, are located on the MLK Campus. (Historical resources in a historic district consist of individual contributors to the district plus the district itself.) Buildings across E. 120<sup>th</sup> Street were not identified in the 2011 FEIR or the 2018 Willowbrook FEIR as significant.

#### **Currently Proposed Project**

#### *Construction and Operation*

The Oasis Clinic is comprised of a modular building constructed in the approximately the year 2003; it has no distinct architectural style and is therefore not considered historic. Therefore, the currently Proposed Project would have no impact on historical resources. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates that the project site has been substantially disturbed, but that new excavation exceeding 20 feet in depth has the potential to impact native soils. The 2011 FEIR provides mitigation measures for excavation below a depth of 15 feet. The 2018 Willowbrook FEIR provides mitigation for excavation below a depth of five feet.

A records search conducted as part of the 2011 FEIR for the MLK Campus indicated that all, or portions of, 28 previous archaeological and/or historic architectural surveys have been conducted within 1 mile from the MLK Campus. Two prehistoric burials and two historic archaeological sites have been recorded within 1 mile of the MLK Campus. No known prehistoric or historic archaeological sites have been recorded on the project site. No mitigation measures were identified as necessary in the 2011 FEIR to ensure impacts remain below a level of significance.

The 2011 FEIR indicates that the closest known fossil localities have been identified west of the MLK Campus in the Athens vicinity around the Harbor Freeway (I-110), from north of Imperial Highway to near El Segundo Boulevard. These localities produced Late Pleistocene fossil specimens of pond turtle (Clemmys), puffin (Mancalla), turkey (Parapova), ground sloth (Paramylodon), mammoth (Mammuthus), dire wolf (Canis dirus), rabbit (Sylvilagus), squirrel (Sciuridae), deer mouse (Microtus), pocket gopher (Thomomys), horse (Equus), deer (Cervus), pronghorn antelope (Capromeryx), and bison (Bison) at depths as shallow as 15 feet below the surface.

The 2018 Willowbrook FEIR indicates that 35 studies have been conducted within a half-mile radius of the specific plan area, with nine cultural resources having been recorded. Of the nine resources, two are located within the specific plan area (the Mojave Road associated with Willowbrook Avenue and/or the railroad tracks and the MLK Medical Center Historic District). Outside the specific plan area three prehistoric

archaeological sites, five historic resources and one multi-component site have been recorded. The 2018 Willowbrook FEIR also notes that there are, numerous residential and commercial buildings that are older than 50 years located within the Specific Plan area that have not been comprehensively surveyed and evaluated.

The 2018 Willowbrook FEIR identifies additional mitigation measures but impacts to historic resources remain significant for the Specific Plan as for the MLK Project.

While the 2011 FEIR found potential impacts to archaeological resources to be less than significant without mitigation, the 2018 Willowbrook FEIR imposes additional mitigation (the requirement for a Phase I cultural resources study) to ensure impacts are less than significant.

There are no formal cemeteries in the area, and the ground has been substantially disturbed for the construction of existing development. A record search with the Native American Heritage Commission did not indicate the known presence of Native American sacred sites, including burial sites, on or within a ½-mile radius of the MLK Campus. The 2011 FEIR includes mitigation to address unexpected discovery of human remains (Cultural-2). The 2018 Willowbrook FEIR imposes similar but slightly different additional mitigation requirements to ensure a less than significant impact.

## **Currently Proposed Project**

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

The currently Proposed Project would require excavation for the building footings and foundations to a depth of about four feet. To the extent that excavation exceeds 5 feet in depth mitigation measures would apply. The currently Proposed Project would not be expected to disturb any human remains, including those interred outside of formal cemeteries. Consistent with the findings of the 2011 FEIR, implementation of Mitigation Measure Cultural – 2 would ensure that this impact remains less than significant. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

## **F. ENERGY**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to energy was evaluated in relation to the 2011 Final EIR, 2018 Willowbrook FEIR, required mitigation measures and two questions recommended for consideration by the *State CEQA Guidelines*. The 2011 Final EIR did not separately address energy; energy considerations were evaluated in connection to Greenhouse Gas emissions.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The California Green Building Standards Code (CALGreen Code) establishes mandatory measures for new non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The 2011 FEIR addressed energy in connection with Greenhouse Gas emissions. As an essential use, medical facility energy use would not be wasteful or inefficient. Building energy and water use would be reduced by design in compliance with the Title 24 Green Building Standards and the County Green Building Program. These efforts, combined with compliance with Title 24’s energy conservation standards for new construction would help to offset increases. Inefficient or wasteful use of energy was not expected, and impacts were less than significant.

The 2018 Willowbrook FEIR indicates:

*No Impact. The Specific Plan is proposed to guide future development and redevelopment in the area and implement TOD land uses. Development projects that are implemented by the proposed Specific Plan would comply with State and County regulations related to energy usage and efficient energy design. Therefore, implementation of the proposed Specific Plan would not result in an inefficient use of energy resources.*

## Currently Proposed Project

### *Construction*

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

Proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy during construction and would not preempt future energy conservation. As a result, impacts related to construction energy use would be less than significant and there would be no new or greater impacts than those identified in the 2011 FEIR.

### **Operation**

Operation of the currently Proposed Project would utilize energy in the same way as identified in the 2011 FEIR, for necessary on-site activities and off-site transportation associated with facility employees, patients, and visitors traveling to and from the site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. The currently Proposed Project would meet or exceed energy standards by incorporating applicable green building measures consistent with the 2045 Los Angeles County Climate Action Plan (CAP). Overall, the currently Proposed Project would provide for energy and water efficiency, would comply with the mandatory measures for new non-residential buildings and would meet or exceed the applicable provisions of Title 24 and the California Green Building Standards in effect at the time of the building permit issuance. As a result, impacts would continue to be less than significant and there would be no new or greater impacts than those identified in the 2011 FEIR.

## **G. GEOLOGY AND SOILS**

Impacts with respect to geology and soils of the currently Proposed Project were evaluated with regard to the 2011 FEIR, the 2018 Willowbrook FEIR and adopted mitigation measures. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to eight questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the Project Area. Analysis of the Appendix G questions in this impact analysis will apply to the decision from *CBIA v. BAAQMD*. The following analysis recaps the 2011 FEIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant.

**Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following:**

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates that development would be expected to result in less than significant impacts related to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault and strong seismic shaking. There are no known surface faults in the immediate vicinity of the MLK Campus, and the MLK Project does not lie within an Alquist-Priolo Earthquake Fault Zones (APEFZ). The project site is located approximately 1.8 miles northeast of the Newport-Inglewood Alquist-Priolo Fault Zone. The project site is roughly 42 miles south of the active San Andreas Fault. The 2011 FEIR indicates that conformance to applicable requirements under the California Building Code (CBC) and Uniform Building Code (UBC) would reduce impacts related to the rupture of a surface fault to the maximum extent possible under current engineering practices.

The overall project area is located within a liquefaction zone. The 2011 FEIR concludes less than significant impacts with respect to strong groundshaking and seismic-related ground failure including liquefaction.

The 2011 FEIR summarizes the California Geological Survey, that indicates that the project site is located within a Seismic Hazard Zone for liquefaction, which indicates a potential for permanent ground displacements such that mitigation, as defined in Public Resources Code Section 2693(c), would be required. The 2011 FEIR indicates that compliance with Office of Statewide Planning and Development (OSHPD) standards would further reduce any potential for impacts resulting from liquefaction.

The 2018 Willowbrook FEIR further indicates that conforming to the California Building Code would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the proposed Specific Plan area to the maximum extent possible under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. The 2018 Willowbrook FEIR finds less than significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

The 2011 FEIR concludes a less than significant impact related to landslides. The topography of the project site and surrounding area is generally flat, and therefore would pose no potential risk for landslides to occur. Moreover, no areas susceptible to seismic-induced landslides are shown in the project vicinity on the USGS 7.5-minute series South Gate topographic quadrangle. Due to the absence of steep slopes, there would be no expected impacts from exposing people or structures to potentially substantial adverse effects involving landslides.

The 2011 FEIR concludes less than significant impacts with mitigation with respect to soil erosion and loss of topsoil and impacts associated with being located on expansive soils (Mitigation Measures Geology-1 through Geology-3).

The 2018 Willowbrook FEIR indicates that the Los Angeles County Low Impact Development (LID) Standards, would reduce offsite runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. By reducing the velocity and quantity of stormwater onsite, the potential for erosion and topsoil loss in landscaped areas caused by runoff is also reduced and impacts related to erosion and topsoil loss would be less than significant.

## **Currently Proposed Project**

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

The currently Proposed Project would not require additional mitigation and there would be no new or greater impacts than those identified in the 2011 FEIR.

The currently Proposed Project would not have the potential to exacerbate conditions related to being located on a geologic unit or soil that is unstable, or that would become unstable and/or being located on

expansive soils. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

The currently Proposed Project would not exacerbate existing conditions with respect to rupture of a known earthquake fault, liquefaction conditions or slopes. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

The 2011 FEIR concluded no impact with respect to soils incapable of supporting septic tanks. The currently Proposed Project would not result in impacts to geology and soils in relation to being located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The currently Proposed Project would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater generated in the project area is treated at the Hyperion Treatment Plant. The Hyperion Treatment Plant is the largest wastewater treatment plant in the City of Los Angeles and is anticipated to have the capacity to support the entire Tier II MLK Project. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

<b>(f) Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</b>		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR includes a mitigation measure to address the potential for encountering paleontological resources (Cultural-1), this would reduce impacts to below a level of significance through the requirement to fully recover paleontological resources from the area of potential effect in accordance with standards for such recovery established by the Society of Vertebrate Paleontology. The 2018 Willowbrook FEIR imposes additional mitigation requirements to ensure a less than significant impact.

Mitigation Measure Cultural-1 requires that prior to any ground-disturbing activities, the County of Los Angeles create a site plan indicating all locations of ground-disturbing activities that affect previously

undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Construction monitoring by a qualified paleontological monitor is required during all ground-disturbing activities that could affect previously undisturbed native soils in areas located 15 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet must stop until a qualified paleontologist assesses the find. The 2018 Willowbrook FEIR imposes additional mitigation requirements (monitoring of ground disturbing activities in native soils starting at five feet below the ground surface) to ensure a less than significant impact.

## **Currently Proposed Project**

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

Consistent with the analysis and conclusions of the 2011 FEIR, Mitigation Measure Cultural-1 (and the additional mitigation identified in the 2018 Willowbrook FEIR) would continue to reduce impacts related to the destruction of unique paleontological resources or unique geologic features below the level of significance; there would be no new or greater impacts than those identified in the 2011 FEIR.

## **H. GREENHOUSE GAS EMISSIONS**

Greenhouse gas emissions associated with the currently Proposed Project were evaluated based on a review of the 2011 FEIR, the 2018 Willowbrook FEIR and the required mitigation measures.

Under CEQA, project evaluation of GHG emissions can “tier off” a programmatic analysis of GHG emissions, such as the recently adopted 2045 Los Angeles County Climate Action Plan (CAP), that meets the *State CEQA Guidelines* Section 15183.5 requirements for a qualifying programmatic analysis. The County has also adopted Title 31 of the County’s Code of Ordinances (the Los Angeles County Green Building Code), which incorporates by reference the CALGreen Code except as modified by Title 31. In addition, the County of Los Angeles General Plan provides recommendations for emission reduction strategies for GHG emissions. As such, if a project is designed in accordance with these policies and regulations, it would result in a less-than-significant impact, because it would be consistent with the overarching local and regional plans and regulations for reducing GHG emissions.

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to greenhouse gas emissions was evaluated in relation to two questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates that, conservatively, the proposed development of the MLK Project would result in significant GHG emissions as a result of building construction, operation and vehicle trips which would be inconsistent with State and regional plans focused on reducing greenhouse gas emissions. The 2011 FEIR identified a total net increase of 19,677 new daily vehicle trips as a result of the MLK Project. Compliance with Mitigation Measure Greenhouse Gases-1 would reduce emissions and ensure sustainable development to the extent feasible.

Similarly, the 2018 Willowbrook FEIR found significant impacts with respect to GHG emissions; additional mitigation measures were identified to reduce air quality emissions that would also reduce GHG emissions. The 2018 Willowbrook FEIR indicated:

*... the proposed Specific Plan's total net annual GHG emissions would be approximately 63,899 MTCO<sub>2e</sub> per year ... Given a service population (total net increase of residents and employees at buildout) increase of 11,410, annual GHG emissions per service population for the proposed Specific Plan would be 5.6 MTCO<sub>2e</sub>/SP. This would not exceed the SCAQMD's proposed efficiency level of 6.6 MTCO<sub>2e</sub>/SP for 2020, but would exceed SCAQMD's proposed efficiency level of 4.1 MTCO<sub>2e</sub>/SP for 2035.... Therefore, the net increase in GHG emissions resulting from implementation of the Specific Plan would be significant for 2035.*

...

*The estimated total annual vehicle miles traveled for the proposed 1,952 residential uses are 32,120,271 miles. The estimated total annual vehicle miles traveled for the proposed 2,666,035 square feet of non-residential uses are 34,191,333 miles. Together, the proposed residential and non-residential uses would result in an estimated annual vehicle miles traveled [VMT] of 66,311,604*

miles. [Which equals 5,549 VMT per service population per year or about 15 VMT per service population per day.]

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would implement a wellness program that would provide services for local youth (18 to 25) in proximity to transit. The currently Proposed Project would generate incremental GHG emissions associated with construction and operation of the building. While the currently Proposed Project would not increase trips, on completion of the Tier II MLK Project, trips associated with the MLK Campus would exceed existing conditions identified in the 2011 FEIR and would contribute towards GHG impacts. As part of the buildout proposed for the approved Tier II MLK Project, the currently Proposed Project would contribute to the significant GHG emissions identified in the 2011 FEIR. Recent GHG guidance (for example the 2022 Scoping Plan and the 2024 RTP/SCS) emphasizes reducing vehicle miles traveled and proximity to transit as key factors in meeting GHG goals; to that end the MLK Campus provides a community use in a location that is well-served by transit. The currently Proposed Project would be within the assumptions of the 2011 FEIR and therefore would not generate additional impacts. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

## I. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the currently Proposed Project were evaluated based on a review of the studies included in the 2011 FEIR and the 2018 Willowbrook FEIR. Impacts were evaluated compared to impacts identified in the 2011 FEIR and 2018 Willowbrook FEIR and the required mitigation measures. Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to eight questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates that with Mitigation Measures Hazards-1 through Hazards-5, the proposed Tier II MLK Project would result in less than significant impacts with respect to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Mitigation Measure Hazards-2 requires that for buildings constructed before 1979, asbestos and lead-based paints be identified and removed properly in accordance with applicable regulations. Demolition and construction activities would include standard cleaning materials, lubricants, and oils.

The entire MLK Campus is registered as a small- and large-quantity generator of hazardous materials such as waste oil and mixed oil; oxygenated solvents including acetone, butanol, and ethyl acetate; spent halogenated solvents; and other hazardous materials including batteries, lamps, pesticides, thermostats, mercury, and silver. The hospital may also deal with biomedical and radiological wastes. However, there are specific government regulations restricting the transport, use, and disposal of these hazardous materials, and the Tier II MLK Project would not entail use of such materials beyond regulated parameters.

Due to the nature of the hospital use of the campus, it is included on multiple environmental regulatory databases for permitted Underground Storage tanks (USTs) and Leaking Underground Storage Tanks (LUSTs). A LUST on the MLK Campus involved an unauthorized release of gasoline, which affected soil. Cleanup of the LUST was completed, and the case was closed by the Regional Water Quality Control Board in 1996. Therefore, this LUST would not result in impacts to people or the environment.

The MLK Campus is included on a list of Resource Conservation and Recovery Act (RCRA) small quantity generators (SQGs), but no violations have been reported. The MLK Campus is also listed under the Hazardous Waste Information System (HAZNET) because it disposes waste oil and mixed oil, paint sludge, inorganic solid waste, oxygenated solvents, polychlorinated biphenyls (PCBs), mercury waste, and asbestos-containing waste. In addition, the MLK Campus is considered an RCRA large-quantity generator (LQG) of waste products such as batteries, lamps, pesticides, thermostats, mercury, silver, halogenated solvents, as well as other ignitable and corrosive hazardous materials. However, no violations were identified.

The 2018 Willowbrook FEIR found less than significant impacts with respect to hazardous materials as a result of existing regulatory requirements reducing any potential impacts to a less than significant level.

## **Currently Proposed Project**

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

The currently Proposed Project would use minimal amounts of hazardous materials typically used in construction and operation of healthcare facilities such as lubricants, fuels, paints, and certain cleaning supplies (e.g. bleach). Consistent with the analysis and conclusions of the 2011 FEIR, the currently Proposed Project, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, would result in less than significant impacts related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

No tank relocations are anticipated, and it is not expected that the currently Proposed Project would result in accidental leaks and spills that would affect the public or the environment. Therefore, consistent with the analysis and conclusions of the 2011 FEIR, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, the currently Proposed Project would result in less than significant impacts related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material, and with respect to the emission of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

Consistent with the analysis and conclusions of the 2011 FEIR, the currently Proposed Project, with implementation of required Mitigation Measures Hazards-1 through Hazards-5, would result in less than significant impacts related to location on a hazardous waste site. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR and 2018 Willowbrook FEIR indicate development on the MLK Campus and related sites would not be expected to result in impacts from hazards and hazardous materials in relation to proximity to an airport or private airstrip, and the creation of safety hazards for people residing or working in the proposed Project Area. The nearest airports are the Compton Airport, located at 901 West Alondra Boulevard in the City of Compton, approximately 2.1 miles south; the Saint Francis Medical Center Helistop in the City of Lynwood, approximately 2.7 miles east; the Gardena Valley Airport in the City of Gardena, approximately 4 miles southeast; and the Hawthorne Municipal Airport in the City of Hawthorne, approximately 4.6 miles west of the MLK Campus. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the MLK Campus. The MLK Project would improve the safety of the existing hospital helipad facilities; no change in impacts involving this helipad would occur.

### **Currently Proposed Project**

### *Construction and Operation*

Consistent with the 2011 FEIR analysis and conclusions, the currently Proposed Project would not be expected to result in significant impacts from hazards and hazardous materials in relation to proximity to

an airport or private airstrip and the creation of safety hazards for people residing or working in the area. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

The purpose of the MLK Project is to improve conditions related to healthcare services. Consistent with the analysis and conclusions of the 2011 FEIR, the currently Proposed Project would not interfere with an emergency response plan or evacuation plan and would therefore not result in significant impacts related to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

As indicated in the 2011 FEIR, the MLK Campus is located in an urban environment without adjacent or nearby wildlands. In addition, the campus is not considered to be in a fire hazard severity zone. Consistent with the analysis and conclusions of the 2011 FEIR (Initial Study), the currently Proposed Project would not result in significant impacts related to exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## J. HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the currently Proposed Project were evaluated in relation to the 2011 FEIR, the 2018 Willowbrook FEIR and required mitigation measures. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to 10 questions recommended for consideration by the *State CEQA Guidelines*.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the project area. Analysis of the Appendix G questions in this impact analysis will apply to the decision from *CBIA v. BAAQMD*. The following analysis recaps the 2011 FEIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant.

Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes that construction could result in erosion, sediment-laden runoff, and discharge of non-storm water runoff. Mitigation would be required to reduce impacts to water quality and groundwater recharge below a level of significance. The 2018 Willowbrook FEIR found less than significant impacts with respect to hydrology and no mitigation measures required as a result of existing regulatory requirements reducing any potential impacts to a less than significant level.

The 2011 FEIR concludes less than significant impacts with mitigation with respect to potential impacts on water quality (Mitigation Measures Hydrology 1 through Hydrology-4 and Hazards-1). The entire area has been previously disturbed. The MLK Project would be required to comply with Mitigation Measures Hydrology-1 through Hydrology-4 and Hazards-1 as well as BMPs consistent with guidelines provided in the California Storm Water Best Management Practices Handbook for Construction Activities and in the Los Angeles County Storm Water Management Program for substantiated erosion or siltation.

The 2011 FEIR indicates that the MLK Campus is located within the Central Basin Municipal Water District. Groundwater has been encountered on the campus at approximately 38 to 52 feet below ground surface. The MLK Campus and its existing uses do not influence the local groundwater basin, and the site does not serve as a groundwater recharge site. Further, neither Tier I nor Tier II of the MLK Project would use groundwater supplies or interfere with groundwater recharge into this basin.

The Willowbrook TOD Specific Plan Programmatic FEIR found that because groundwater withdrawals from the Central Groundwater Basin are limited based on adjudication that would eliminate the potential for the water agencies serving the area to substantially impact the groundwater aquifer.

## **Currently Proposed Project**

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

With implementation of the adopted mitigation measures and compliance with existing regulations, the currently Proposed Project would result in less than significant impacts with respect to violating any water quality standards or waste discharge requirements. The currently Proposed Project would entail both construction and operational elements. The demolition of the existing Oasis Clinic and subsequent site clearing could contribute to erosion, sediment-laden runoff, discharge of non-storm water runoff, or other water quality-related events. All construction activities would include implementation of best management practices (BMPs) to reduce or eliminate non-storm discharges to the storm water system. Implementation of BMPs would result in meeting the water quality standards set forth by responsible agencies, and would address storm runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. BMPs would be incorporated in accordance with the National Pollution Discharge Elimination System (NPDE permit issued to the County by the Regional Water Quality Control Board (RWQCB), the County Storm Water Management, and the County General Plan. With implementation of Mitigation Measures Hydrology-1 through Hydrology-4 and Hazards-1, the currently Proposed Project (together with other completed Tier II projects) would result in less than significant impacts in relation to violating any water quality standards or waste discharge requirements.

Consistent with the 2011 FEIR, the currently Proposed Project would not result in impacts to groundwater. There is no potential for the currently Proposed Project to contribute to the depletion of groundwater supplies or to create substantial interference with groundwater recharge for the area.

Consistent with the 2011 FEIR, the currently Proposed Project would not result in impacts to hydrology and water quality in relation to groundwater supplies or groundwater recharge. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates that the MLK Project would not be expected to result in impacts to hydrology and water quality in relation to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on or off site.

The 2018 Willowbrook FEIR indicates that construction activities would be required to implement erosion and sediment control BMPs required by the Construction General Permit and MS4 Permit regulations. Compliance with these regulations would ensure substantial erosion or siltation does not occur onsite. These requirements would include the implementation of BMPs as required by the County Pollution Control Requirements for Construction Activities. It further indicates that because the majority of the Specific Plan is already developed, new development is required to implement the County LID Standards Manual, and the Specific Plan includes Sustainable Design Criteria, the implementation of development within the Specific Plan area would result in less than significant impacts with respect to erosion, siltation and water quality.

The 2018 Willowbrook FEIR indicates that development is not expected to directly trigger any need for upgrades to the County’s existing storm drain major backbone facilities, mainly due to the LID Ordinance requirements for percolation and on-site detention for new development, which will stabilize and/or even reduce runoff in the area. Therefore, the County does not recommend an upgrade of the existing storm

drain system within the Specific Plan area. Impacts related to exceeding the capacity of existing and planned storm drains are identified as less than significant.

### Currently Proposed Project

#### *Construction and Operation*

The currently Proposed Project would not substantially alter the existing drainage pattern of the site or area since it is already entirely covered with impervious surfaces. With implementation of erosion and sediment control BMPs, construction activities associated with the currently Proposed Project would result in less than significant erosion and siltation impacts. The currently Proposed Project would not impede or redirect flood flows.

There are no existing drainage patterns on or within the vicinity that would be substantially impacted by the currently Proposed Project. The Los Angeles storm drain system provides stormwater drainage in the project area; LACDPW has implemented measures to initiate storm water pollution reduction programs throughout the County. The currently Proposed Project together with other development on the MLK Campus would not be expected to contribute substantial additional runoff as the currently Proposed Project together with completed and proposed development would not substantially increase impervious surfaces.

Consistent with the 2011 FEIR, the currently Proposed Project (together with Tier II projects completed to date) would result in less than significant impacts with mitigation related to drainage patterns, erosion, siltation, rate of runoff, capacity of the drainage system or substantial sources of polluted runoff. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

<b>Does the currently Proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following:</b>		
<b>(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</b>		
	<b>Yes</b>	<b>No</b>
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR and 2018 Willowbrook FEIR concluded no impact with respect to a flood hazards. As indicated in the 2011 FEIR, the project area is not located within a 100-year or 500-year flood zone. Therefore, there would be no expected impacts to hydrology and water quality related to a flood hazards.

As indicated in the 2011 FEIR, the County of Los Angeles maintains over 15 major dams and a host of other flood control facilities such as spreading grounds within the County. The flood control facilities within the MLK Medical Campus vicinity are maintained by the County Flood Control District and are in compliance with local, state, and federal regulations. The 2011 FEIR indicates that development on the MLK Campus would have no impacts on, nor be impacted by, the operation of the existing levees or dams.

The 2011 FEIR concludes no impact with respect to seiche, tsunami and mudflow. Tsunamis are tidal waves generated in large bodies of water in response to ground shaking. The elevation in the Project Area ranges from approximately 85 feet above mean sea level (MSL) to 105 feet above MSL. As indicated in the 2011 FEIR, the project area is roughly 10 miles east of the Pacific Ocean. Due to the and distance from the ocean and other bodies of water, there would be no direct or indirect impacts related to seiches or tsunamis. A mudflow is a large flow of mud resulting from soil saturation on steep slopes. The project area is not located in a section of the County that is susceptible to mudslides and there are no steep slopes with soils or vegetation in the project area.

## Currently Proposed Project

### *Construction and Operation*

Consistent with the analysis and conclusions of the 2011 FEIR and 2018 Willowbrook FEIR, the currently Proposed Project would not be expected to result in impacts in relation to flood hazards, inundation by seiche, tsunami, or mudflow. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## K. LAND USE AND PLANNING

Land use and planning impacts of the currently Proposed Project were evaluated in light of the 2011 FEIR and the Willowbrook TOD Specific Plan Programmatic FEIR. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to three questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes no impact with respect to dividing an established community. Physical division of an established community typically occurs when linear elements such as train tracks or a new highway separates parts of the community. No such elements would occur with the currently Proposed Project. As indicated in the 2011 FEIR, development of the MLK Project would not cause a physical division within the established community.

The 2018 Willowbrook FEIR indicates less than significant impacts with respect to dividing an established community.

### Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would be a continuation of medical and medical-related uses on an existing site related to the MLK Campus and would be complementary to uses on the Charles Drew University campus.

The currently Proposed Project would be consistent with the analysis and conclusions of the 2018 Willowbrook FEIR as well as the 2011 FEIR and there would be no impacts to land use and planning resulting in a physical division to the established community. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR concludes less than significant impacts with respect to conflicts with an applicable plan. The 2018 Willowbrook FEIR indicates less than significant impacts with respect to anticipated development and consistency with applicable plans and policies.

**Currently Proposed Project**

*Construction and Operation*

The currently Proposed Project would result in providing wellness care for young adults (18 to 25). The Willowbrook TOD Specific Plan is intended to increase development in the specific plan area consistent with state, regional and local polices. The currently Proposed Project would be consistent with the Willowbrook TOD Specific Plan and therefore also consistent with other applicable plans, polices and regulations.

The TAY Drop-In Center Building would be located in the MLK Medical Center and Associated Facilities Subarea with a Specific Plan zone designation of MLK Medical Overlay (FAR 2.5) and a General Plan land use designation of MU - Mixed Use. The currently Proposed Project would be approximately ¼ mile from the Metro Willowbrook/Rosa Parks Station, a light rail station at the junction of the Metro A-Line and C-Line that would facilitate minimizing vehicle trips -- an important land use policy identified in state, regional and local land use plans that would facilitate reduced GHG emissions and reduced vehicle trips and vehicle miles traveled. There would be no new or greater impacts than those identified in the 2011 FEIR.

**L. MINERAL RESOURCES**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to the 2011 FEIR, 2018 Willowbrook FEIR and two questions recommended for consideration by the *State CEQA Guidelines*.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

As indicated in the 2011 FEIR, and 2018 Willowbrook FEIR anticipated development is not expected to result in impacts to mineral resources in relation to the loss of availability of a known mineral resource and concludes no impact with respect to mineral resources. The 2011 FEIR summarizes the California Geological Survey report and indicates that there are no known mineral resources of statewide or regional importance produced within the Project Area. According to the Mines and Minerals Producers Active in California (1977–1998), the County of Los Angeles contains 25 active mines. However, there are no mining districts located in or around the vicinity of the project site. Therefore, there would be no expected impacts to mineral resources related to the loss of availability of a known mineral resource.

**Currently Proposed Project**

*Construction and Operation*

The currently Proposed Project would result in no impacts in relation to mineral resources, consistent with the 2011 FEIR.

**M. NOISE**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the 2011 FEIR, the 2018 Willowbrook FEIR and six questions recommended for consideration by the *State CEQA Guidelines*.

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

**2011 FEIR and 2018 Willowbrook FEIR**

The 2011 FEIR indicates that an increase of 4 dBA CNEL or more would result in a significant adverse impact. (CNEL is a 24-hour noise descriptor that averages noise over a 24-hour period and artificially adds a decibel increment to noise that occurs in the evenings and at night). In the 2011 FEIR, the measured ambient noise levels in the area north of the MLK Campus during peak afternoon hours was measured as 66.2 dBA Leq.

***Construction***

Project demolition, site preparation, and construction activities would be typical of such activities and would be within the assumptions made in the 2011 FEIR. Demolition, site preparation, and construction activities would be within the assumptions identified in **Table 3**. Construction is not allowed between 8:00 pm and 7:00 am Monday through Friday or anytime on Sunday. Saturday construction could occur between 7:00 am and 5:00 pm.

Anticipated construction noise at 50 feet is shown in **Table 5** (reproduced from the 2011 FEIR – FEIR Table 3.8.4.2-1, page 3.8-10). Residential uses within 80 feet of a construction site are identified in the 2011 FEIR as significantly impacted (with mitigation).

Implementation of Mitigation Measures Noise-1 through Noise-3 (which require noise muffling devices, barriers/curtains, vehicle maintenance and use of sonic piles within 55 feet of residences) would reduce noise as feasible. The 2018 Willowbrook FEIR identifies additional mitigation for construction within 50 feet of residential uses (NOI-3).

The majority of construction activity on the MLK Campus would not be expected to exceed thresholds at sensitive receptors.

**Table 5**  
**Typical Construction Noise Levels at 50 Feet**

Activity	Noise Level at 50 feet (dBA)
Ground Clearing/Demolition	84 ± 6 dBA
Excavations	89 ± 6 dBA
Foundations	78 ± 3 dBA
Erection of structures	85 ± 5 dBA
Finishing (i.e., paving)	89 ± 6 dBA

*Source: Bolt, Beranek, and Newman. December 1971. Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances. Washington, DC. (Table 3.8.4.2-1 of the 2011 FEIR. The same table [3.9-12] is included in the 2018 Willowbrook FEIR but without the +/- modifiers.)*

The 2011 FEIR found that construction activities would result in less than significant impacts with mitigation with respect to vibration impacts to residential structures within 50 feet of pile driving (Mitigation Measure Noise-3).

The 2011 FEIR indicates that vibration from construction activities (pile driving, large bull dozers and loaded trucks) would be perceptible in adjacent residences but that because construction activities would be limited to daytime hours and activities would be infrequent, vibration perception impacts from construction are considered less than significant. Mitigation Measure NOI-3 from the 2018 Willowbrook FEIR addresses vibration within 50 feet of residential buildings.

The 2018 Willowbrook FEIR indicates that as individual development projects would occur intermittently over the proposed Specific Plan's 20-year build out period, construction activities for each new development would expose their respective nearby existing uses to increased noise levels. Construction noise impacts associated with each site-specific development would be short-term in nature and limited to the period of time when construction activity is taking place for that particular development. The 2018 Willowbrook FEIR further indicates that:

*As individual development projects would occur intermittently over the proposed Specific Plan's 20-year build out period, construction activities for each new development would expose their respective nearby existing uses to increased noise levels. Construction noise impacts associated with*

*each site-specific development would be short-term in nature and limited to the period of time when construction activity is taking place for that particular development.*

*Construction that occurs immediately adjacent to these existing offsite receptors would generate noise levels that would be substantially greater than the existing noise levels at these receptor locations. Based on the project construction noise levels for general outdoor construction activities and specific construction equipment shown in Tables 3.9-12 and 3.9-13, respectively [same as Table 5 above], these construction noise levels could expose adjacent receptors located within 50 feet to noise levels up to 89 dBA Leq or above. It should be noted that this noise level is not anticipated to occur throughout the entire course of a construction day, as construction equipment and activities rarely operate continuously for a full day at a construction site. Typically, the operating cycle for construction equipment would involve one or two minutes of full power operation followed by three or four minutes at lower power settings. Additionally, construction equipment engines would likely be intermittently turned on and off over the course of a construction day.*

*With respect to construction activities, the County's General Plan Noise Element does not establish a numerical standard to regulate construction noise levels. However, Section 12.08.440 of the LACC has established numerical standards to regulate construction noise levels at buildings with specific land uses as shown in Table 3.9-7. In addition, Section 12.08.440 of the LACC limits construction activities in the County to between the hours of 7:00 am to 7:00 pm on weekdays (including Saturday's), and prohibits construction on Sundays and holidays. Construction activities may occur outside of these hours if the County determines that the emergency maintenance, repair, or improvement of public service utilities is needed or if a variance is issued by the health officer.*

*All new development projects in the Specific Plan area would be subject to these regulations. Because construction activities are required to comply with the regulations in the LACC, the construction activities associated with future developments in the Specific Plan area would not exceed any standards established in the LACC. Thus, impacts would be less than significant.*

The 2018 Willowbrook FEIR provides for additional noise and vibration mitigation for residential development and construction activities within 50 feet of occupied residential structures (NOI-3). These measures would not apply to the currently Proposed Project as it is not residential and is more than 50 feet from residential development but measures applicable to activities within 50 feet of occupied residential structures would apply to construction activities of the North Parking Structure that are within 50 feet of the adjacent five-story apartment building.

### ***Operation***

The 2011 FEIR indicates that mechanical equipment would result in a less than significant impact with mitigation (Mitigation Measure Noise-4). Regulatory compliance would also address mechanical equipment operation.

The 2011 FEIR indicates that operational noise from mobile sources would be less than significant. The currently Proposed Project together with Tier II development completed and proposed to date would not result in traffic exceeding existing levels identified in the 2011 FEIR. Therefore, mobile-source noise levels

resulting from operation of the MLK Campus would not be greater than existing conditions identified in the 2011 FEIR. Eventually on completion of Tier II, traffic and associated noise is expected to increase but not to a level where mobile-source noise would result in a significant impact.

Similarly, the 2018 Willowbrook FEIR found less than significant noise impacts associated with operation of development under the Specific Plan.

## **Currently Proposed Project**

### ***Construction***

No pile driving is proposed as part of the currently Proposed Project and no residential development is located within 50 feet of construction. The currently Proposed Project would be about 140 feet from the nearest residential use (a five-story apartment building). However, construction of the TAY Drop-In Center may occur simultaneously with construction of the North Parking Structure located adjacent to the apartment building. The construction of these two buildings could be perceived as one larger activity near the five-story apartment building. The North Parking Structure Building would be set back 43 feet from the property line and the apartment building itself is set back about five feet from the property line; mitigation measure NOI-3 would apply. Noise and vibration impacts of construction would be within those evaluated in the 2011 FEIR and the 2018 Willowbrook FEIR. No additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

### ***Operation***

The currently Proposed Project could include new mechanical equipment that could be audible adjacent to the structure. Mitigation Measure as well as regulatory compliance would ensure that noise from mechanical equipment remains below 45 dBA at the apartment building to the northeast through use of quiet equipment and/or use of insulating screens. Therefore, no additional mitigation would be required and there would be no new or greater stationary-source noise impacts than those identified in the 2011 FEIR. There would be no vibration impacts associated with operation of the currently Proposed Project. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR and 2018 Willowbrook FEIR conclude no impact with respect to noise from airports and airstrips. As indicated in the 2011 FEIR the project site is neither located within 2 miles of a public or private airstrip nor is it located within an airport land use plan.

The nearest airport, the Compton/Woodley Airport, is located approximately 2.1 miles south of the MLK Campus, and the next nearest airport, the Gardena Valley Airport in the City of Gardena, is located approximately 4 miles southeast of the MLK Campus. The Project Site is not located within the immediate vicinity of any private airstrip. The nearest private airstrip is located in Playa Vista at 5510 Lincoln Boulevard, approximately 11.5 miles northwest of the MLK Campus. The Saint Francis Medical Center, which is located in the City of Lynwood, approximately 2.7 miles east of the MLK Campus has a helistop. The 2011 FEIR identifies a helipad on the roof of the Inpatient Tower for hospital-specific emergency use.

### **Currently Proposed Project**

### *Construction and Operation*

The currently Proposed Project would not change impacts as compared to the evaluation included in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## **N. POPULATION AND HOUSING**

Population and housing impacts of the project were evaluated with regard to the 2011 FEIR and the 2018 Willowbrook FEIR. The potential for the currently Proposed Project to result in new or substantially more

adverse significant was evaluated in relation to three questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes less than significant impacts with respect to population, and no impact with respect to displacement of housing and people. As indicated in the 2011 FEIR, the density and type of new development included in the MLK Tier II Project, is within the growth anticipated and accommodated by the County General Plan.

The 2018 Willowbrook FEIR indicates that neither operational or construction activities associated with the implementation with the Specific Plan would induce population, housing and job growth that would result in impacts to the environment.

### **Currently Proposed Project**

### *Construction and Operation*

The currently Proposed Project would be within the assumed MLK Campus population identified in the 2011 FEIR and would not displace people or housing and therefore would have a less than significant impact as identified in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

**O. PUBLIC SERVICES**

Public Services impacts of the currently Proposed Project were evaluated based on a review of the 2011 FEIR and the 2018 Willowbrook FEIR. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to public services was evaluated in relation to one question (relevant to each public service) recommended for consideration by the *State CEQA Guidelines*.

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

**i) Fire**

***2011 FEIR and 2018 Willowbrook FEIR***

**Construction and Operation**

The 2011 FEIR indicates that the proposed redevelopment of the MLK Campus would result in less than significant impacts with respect to fire protection. The analysis indicates that the project area is served adequately by the existing fire protection facilities, therefore no mitigation is required.

The 2011 FEIR indicates that, *[i]t is understood however, that the County of Los Angeles Fire Department will review the specific fire department requirements during the planning phase of the proposed project in order to determine whether Tier II of the proposed project adequately meets the requirements of the County of Los Angeles Fire Department.* LA County Fire Department will approve final project plans prior to issuance of building permits.

The 2018 Willowbrook FEIR indicates that:

*Individually proposed development projects within the Specific Plan area would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). These project design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits for each development project in the Specific Plan. These existing County development permitting procedures further minimize potential impacts associated with provision of fire protection services. Therefore, implementation of the Specific Plan would not require provision of new or physically altered fire protection facilities construction of which could cause significant environmental impacts. Hence, the Specific Plan would not result in impacts related to fire protection services.*

### **Currently Proposed Project**

#### **Construction and Operation**

The currently Proposed Project together with all Tier I and Tier II development completed to date is within the assumptions for Tier II development analyzed in the 2011 FEIR and therefore would not create any additional demand for fire protection beyond what was analyzed. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

#### **ii) Police Protection**

##### **2011 FEIR and 2018 Willowbrook FEIR**

#### **Construction and Operation**

The 2011 FEIR indicates that redevelopment of the MLK Campus and related facilities would not lead to additional population growth in the area and that overall development on the MLK Campus would have a less than significant impact on police protection. The 2011 FEIR indicates that while the allocation of police services would shift and grow consistent with population growth in the area, development of the MLK Campus and related facilities would not cause the provision of, or need for, new or physically altered governmental police protection facilities in order to maintain acceptable response times, and therefore there would be no significant impacts related to police protection facilities.

The 2018 Willowbrook FEIR indicates that:

*The demand for sheriff services and facility/equipment maintenance needs would increase gradually over the incremental implementation of the Specific Plan, and the Sheriff's Department would add staff, equipment, and maintenance services on an as-needed basis in order to accommodate these increased demands. As described by the County's General Plan EIR and confirmed by the Sheriff's*

*Department, the existing Century Station facility would be able to accommodate buildout of the General Plan.*

...

*Overall, because the Sheriff's Century Station is located adjacent and east of the Specific Plan boundary and can directly serve the Plan area, and would be able to accommodate six additional sworn officers needed to meet the anticipated demand from buildout of the proposed Specific Plan, implementation of the Specific Plan would not require new or physically altered Sheriff Department facilities, construction of which could cause significant environmental impacts. Hence, the Specific Plan would not result in physical environmental impacts related to the development or expansion of sheriff department facilities.*

### ***Currently Proposed Project***

#### **Construction and Operation**

The currently Proposed Project would have a less than significant impact on police services consistent with the evaluation in the 2011 FEIR. The Los Angeles County Sheriff's Department will review the final plans prior to issuance of permits to ensure that appropriate security features are included. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

### **iii) Schools**

#### ***2011 FEIR and 2018 Willowbrook FEIR***

#### **Construction and Operation**

The 2011 FEIR indicates a less than significant impact to schools as a result of development of the MLK Campus and related facilities.

Further the 2018 Willowbrook FEIR indicates that:

*Payment of development impact fees, as required by Government Code Section 65995 and the Compton USD would be required for each development project, which would provide for funding of new facilities and would constitute mitigation of impacts related to the provision of school services. Therefore, impacts related to school facilities from implementation of the proposed Specific Plan would be less than significant.*

### ***Currently Proposed Project***

#### **Construction and Operation**

The currently Proposed Project would not generate additional population and would not result in additional children in the project area; it would therefore have no impact on school facilities consistent with

the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

#### **iv) Parks**

##### ***2011 FEIR and 2018 Willowbrook FEIR***

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

The 2011 FEIR indicates a less than significant impact to parks as a result of development of the MLK Campus and related facilities. The MLK Campus would include a number of garden areas and would not generate additional population and therefore would not result in impacts to park facilities consistent with the evaluation in the 2011 FEIR.

Further, the 2018 Willowbrook FEIR indicates that:

*As described in the County General Plan EIR, enforcement of the General Plan goal of four acres of local parkland for every 1,000 residents as a condition of approval where an appropriate nexus exist would serve to reduce the potential for deterioration of facilities by allowing for new facilities and adequate funding. The Los Angeles County Measure A funding would add a parcel tax of one-and-a-half cent per square foot of developed property. The additional development that would occur by implementation of the Specific Plan would generate additional Measure A funds which will provide funding for parks and recreation projects. Overall, implementation of the proposed Specific Plan would result in less than significant impacts related to physical deterioration of existing park and recreation facilities.*

#### ***Currently Proposed Project***

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

The currently Proposed Project would include open areas suitable for project clients to relax. There would be no new or greater impacts to parks than those identified in the 2011 FEIR.

#### **v) Other Public Facilities / Libraries**

##### ***2011 FEIR and 2018 Willowbrook FEIR***

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

The 2011 FEIR indicates a less than significant impact to other public facilities as a result of development of the MLK Campus and related facilities.

Further the 2018 Willowbrook FEIR indicates that:

*Because the proposed Specific Plan would implement redevelopment and infill development within the urban area that is already served by developed service infrastructure, as directed by the County General Plan's policies, the project would not require development of other public service facilities, the construction of which could cause significant environmental impacts.*

...

*The addition of 6,383 new residents within the Specific Plan area over the 20-year plan is anticipated to increase demand for library services and facilities. However, based on the widespread use of the internet by people of Los Angeles County, it is reasonable to assume that many of the residential units could be equipped with internet access, which provides access to many of the same resources provided by the library and would limit the increased need for library services and resources. Thus, the existing four County library facilities would be able to accommodate the increased demand from the addition of 6,383 residents over the 20-year buildout of the Specific Plan. Buildout of the proposed Specific Plan would not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Therefore, impacts to library services associated with implementation of the proposed Specific Plan would not occur.*

### ***Currently Proposed Project***

#### **Construction and Operation**

The currently Proposed Project would not generate additional population and would have no impact to other public facilities or libraries consistent with the discussion in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

#### **P. RECREATION**

The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to the 2011 FEIR, 2018 Willowbrook FEIR and two questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR indicates no impact to recreation as a result of redevelopment of the MLK Campus and related facilities. Further the 2018 Willowbrook FEIR indicates that:

*The proposed Specific Plan would result in an increase in population by 5,778 residents (assuming no vacancy) over the 20-year Specific Plan implementation timeline. ... there are 147.97 acres of County parkland within the Willowbrook community which based on the 2015 population of 20,685 residents provides 7.15 acres of County parkland per 1,000 residents. The increase in population from buildout of the proposed Specific Plan would reduce the park acreage to 5.63 acres of County parkland per 1,000 residents, which is above the County's goal to provide 4.0 acres of local parkland per 1,000 residents (County of Los Angeles, 2015). Therefore, based on the County's planning criteria, buildout of the proposed Specific Plan would not result in the need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, and impacts would not occur.*

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would include relaxation areas for clients and staff. The currently Proposed Project would not generate additional population and therefore would not have an impact on recreational facilities consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

**Q. TRANSPORTATION AND CIRCULATION**

Transportation and traffic impacts of the project were evaluated in light of the 2011 FEIR and the 2018 Willowbrook FEIR. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to six questions recommended for consideration by the *State CEQA Guidelines*.

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

**2011 FEIR and 2018 Willowbrook FEIR**

***Construction and Operation***

The 2011 FEIR concludes less than significant impact with respect to adopted plans and policies regarding transit, bicycle or pedestrian facilities. The currently Proposed Project would be consistent with the 2018 Willowbrook FEIR as well as other applicable plans, programs and policies regarding transit, bicycle and pedestrian facilities in much the same way as analyzed in the 2011 FEIR. The 2011 FEIR did not identify adverse impacts to bicycle facilities.

The 2011 FEIR concludes that traffic impacts (including impacts related to applicable plans and the Congestion Management Plan) would be less than significant with mitigation (Mitigation Measures Traffic-1 through Traffic-3).

The 2018 Willowbrook FEIR identifies a number of impacts to local intersections as well as mitigation measures. Several impacts to local intersections remained significant even after mitigation.

## Currently Proposed Project

### *Construction*

Trips associated with construction of the TAY Drop-In Center would be within the assumptions of the 2011 FEIR with respect to anticipated construction activity associated with the MLK Campus.

### *Operation*

The following discussion summarizes the Traffic Analysis for the Willowbrook TAY Drop-In Center (see Attachment A to this Addendum). The approximately 6,000 square-foot<sup>3</sup> Oasis Clinic would be replaced with the approximately 9,345-square-foot TAY Drop-In Center that would serve the Willowbrook community. The Oasis Clinic is part of the MLK Tier II Project evaluated in the 2011 FEIR.<sup>4</sup> While the 2011 FEIR does not contemplate replacement of the Oasis Clinic specifically, it does evaluate an overall increase in floor area of 1,476,010 square feet of hospital-related uses.

The 2011 FEIR uses the ITE Trip Generation, 8<sup>th</sup> Edition which includes trip generation for medical office of 36.13 trips per 1,000 square feet and transit use of 15%. The Oasis Clinic was a medical office (that was in operation at the time the 2011 FEIR was prepared) and therefore is assumed to have generated approximately 184 trips per day.<sup>5</sup> As noted above, the MLK Campus and project area in general including the Oasis Clinic site is well-served by transit. It is approximately 1,400 feet from the Willowbrook Rosa Parks Light Rail Station that serves both the A Line (formerly Blue Line) and C Line (formerly Green Line). In addition, numerous bus lines run along 120<sup>th</sup> Street adjacent to the site on the south and Wilmington Avenue about 400 feet to the east.

The TAY Drop-In Center is a relatively new type of facility that was not and is not identified by ITE for purposes of estimating trip generation. It is a facility intended to provide safety and basic support for youth (18 to 25) exiting the foster care system. The proposed TAY Drop-In Center will provide clinical services including mental health, physical health, substance use prevention, as well as supported education and employment, and peer and family support — on their own terms. This new approximately 9,345-square-foot building will be two stories and will include offices, conference facilities, open lounge space, laundry

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<sup>3</sup> The 2011 FEIR identifies the Oasis Clinic as 1,850 square feet in error. DPW has confirmed that the building is approximately 6,000 square feet.

<sup>4</sup> 2011 FEIR, page 2-3 footnote 7: “[t]he Hub Clinic and the Oasis Clinic (new) buildings are located north of the existing 38-acre campus but are considered part of the existing campus structures and operations.”

<sup>5</sup> As noted above, the 2011 FEIR assumes an incorrect building area for the Oasis Clinic and assumes an overall trip generation of 16.5 trips per 1,000 square feet for all existing hospital uses including clinic uses such as the Oasis Clinic. This number is then used to calculate the net increase in trips from proposed net changes to floor area (using more detailed assumptions regarding uses and trip generation) as compared to existing conditions.

and folding area, showers, group rooms, chat rooms exam rooms, small cafeteria, and relaxation areas including possibly an atrium.

The clients who use TAY Drop-In services rely on public transportation and do not own cars. Many of them are unhoused. DMH anticipates the facility will generally operate from 1 pm to 8 pm (up to 10 pm if needed) six days per week. Based on similar facilities,<sup>6</sup> DMH estimates that the proposed MLK TAY Drop-In Center will serve about 25 clients per day.

The facility would have 10 employees from 1 pm to 3 pm with an additional 5 employees from 3 pm to 8 pm (or 10 pm if needed) for a total of approximately 15 employees per day. Staffing is anticipated to include office hours for physicians and councilors already located on the MLK Campus. Conservatively assuming two new trips per day per employee, the TAY Drop-In Center would generate 30 trips per day; 25 trips per day assuming 15% transit use, which would be less than trips from the Oasis Clinic medical office building.<sup>7</sup>

In conclusion, with respect to the traffic analysis included in the 2011 FEIR, replacement of the Oasis Clinic with the TAY Drop-In Center would have negligible effect on trip generation (fewer trips would be generated than considered in the 2011 FEIR). Therefore, no further analysis of traffic issues is warranted.

The currently Proposed Project would have a comparable less than significant impact as the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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<sup>6</sup> The very successful Hollywood TAY Drop-In Center which is more than double the size of the proposed MLK facility and provides more robust services than proposed at Willowbrook, serves about 50 clients per day (including clients from the Willowbrook area).

<sup>7</sup> Even if the Oasis Clinic were 1,850 square feet it would have generated more trips than anticipated for the Willowbrook TAY Drop-In Center (Oasis Clinic:  $1.85 \times 36.13 = 67$  minus 15% = 57 trips). Using the generic 16.5 trips per 1,000 sf of hospital use that the 2011 FEIR assumes for all existing uses and assuming 1,850 square feet at the Oasis Clinic, the 2011 FEIR assumes about 26 trips from the Oasis Clinic ( $1.85 \times 16.5 = 30.525$  minus 15% = 26 trips). CEQA documents including traffic studies evaluate impacts of projects based on a comparison of impacts with a project compared to existing conditions (not total impacts from a site). The 2011 FEIR calculates net trip generation based on future project trips minus estimated existing trips. By making a simplifying assumption that all hospital-related uses at the MLK Jr. Medical Center generate trips at the lower hospital rate (rather than some uses generating trips at the higher medical office/clinic rate), and by undercounting existing floor area, the 2011 FEIR underestimates existing trips and therefore overestimates the net change in trips due to the project. This results in a conservative analysis in the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR concluded a less than significant impact with respect to increased hazards due to a design feature.

**Currently Proposed Project**

*Construction and Operation*

The currently Proposed Project would not introduce a new design feature that would increase hazards. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The 2011 FEIR concluded less than significant impact with respect to emergency access. The 2011 FEIR indicates that evacuation plans and procedures, emergency access ingress and egress points, fire lanes, and appropriate turnaround radii for internal and external streets will be provided to the satisfaction of the Los Angeles County Fire Department.

## Currently Proposed Project

### *Construction and Operation*

No permanent lane closures or obstructions that could impede emergency response to or from the site from surrounding streets would occur with the currently Proposed Project. Consequently, the currently Proposed Project would result in a less than significant impacts related to emergency access and impacts would be comparable to those anticipated in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## R. TRIBAL CULTURAL RESOURCES

Tribal Cultural Resources of the currently Proposed Project were evaluated with regard to the 2011 FEIR. Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The Notice of Preparation (NOP) for the Final EIR was published in March 2010, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of the *State CEQA Guidelines* to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts was evaluated with respect to the 2018 Willowbrook FEIR (which did include outreach to tribes and a separate evaluation of Tribal Cultural Resources), and in relation to two questions recommended for consideration by the State CEQA Guidelines (see also E. Cultural Resources above).

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

Impacts related to Tribal Cultural Resources were not separately addressed from Archeological Resources in the 2011 FEIR and are addressed as part of the evaluation of Cultural Resources (see Section E. Cultural Resources above). AB 52 (requiring consultation with native American Tribes) went into effect July 1, 2015, and does not apply to the 2011 FEIR and addenda as the Draft EIR was released before that date. The 2011 FEIR indicated that Tribal consultation under Senate Bill (SB) 18 would assist in the prevention of impacts on Native American cultural resources.

Native American consultation was conducted as part of the 2018 Willowbrook FEIR. The County received letters from the Gabrieleno Band of Mission Indians – Kizh Nation requesting consultation under SB 18 and AB 52. The County and Tribal representatives from the Gabrieleno Band of Mission Indians – Kizh Nation engaged in consultation. The Tribe did not identify known cultural places located on land within the County’s project area boundaries that would be affected by the proposed General Plan Amendment; however, the Tribe indicated that the project area is sensitive for prehistoric and ethnohistoric Native American archaeological resources.

The 2018 Willowbrook FEIR imposes additional mitigation requirements to ensure a less than significant impact. The 2018 Willowbrook FEIR evaluates potential impacts to tribal resources and found that mitigation measures for archaeological resources (CUL-5) and human remains (CUL-7) would adequately mitigate any potential impacts.

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would not result in additional impacts beyond those identified above under Cultural Resources and impacts would continue to be less than significant with mitigation. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## S. UTILITIES

Utilities and service systems impacts of the currently Proposed Project were evaluated with regard to the 2011 FEIR (including the Initial Study), the Proposed Project would be consistent with the Willowbrook and required mitigation measures. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to seven questions recommended for consideration by the *State CEQA Guidelines*.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes less than significant impacts with mitigation with respect to wastewater treatment requirements and wastewater treatment facilities (Mitigation Measure Utilities-1). The 2011 FEIR indicates that Tier II development as a whole would not exceed the wastewater treatment requirements or standards of the RWQCB. The wastewater generated would be treated at the Hyperion Treatment Plant.

With respect to water and wastewater facilities the 2018 Willowbrook FEIR indicates that:

*The land uses proposed by the Specific Plan include residential, mixed-use, medical, educational and commercial uses that would not discharge wastewater that contains harmful levels of toxins*

*beyond the regulations of the LARWQCB and all effluent would comply with the wastewater treatment standards of the RWQCB. The Specific Plan would not facilitate any industrial use development that would generate hazardous wastewater flows, which generally has more adverse impacts on wastewater treatment. ... wastewater generated by the Specific Plan would not exceed the existing capacity of wastewater treatment facilities serving the Specific Plan area. Therefore, the project would result in less than significant impacts related to the wastewater treatment requirements of the LARWQCB.*

...

*Most of the existing water pipelines in the Specific Plan area are eight-inches in diameter and above and have the capacity to accommodate the increase in water demand/load at buildout of the proposed Specific Plan.*

...

*[I]mplementation of the Specific Plan would result in the need to upgrade the existing trunk sewers which could cause significant environmental effects associated with air quality and greenhouse gas emissions, noise and traffic safety during construction activities.*

The 2018 Willowbrook FEIR identifies a mitigation measure requiring that individual projects conduct a sewer study to confirm adequate capacity in the trunk sewers that service the site.

The 2011 FEIR concludes impacts to storm drains related to Tier II development would be less than significant. Although the proposed MLK Campus Redevelopment Project as a whole could result in an increase of the impervious surface area of the site, compliance with proper building design and the Los Angeles County LID Ordinance would ensure that the site is adequately drained, and that storm water is infiltrated to the extent feasible.

With respect to stormwater facilities the Willowbrook FEIR indicates:

*Implementation of the Specific Plan would develop pervious areas to retain and infiltrate stormwater on development sites pursuant to the County's SUSWMP [Standard Urban Storm Water Mitigation Plan] and LID requirements that reduce and manage drainage. County SUSWMP requirements provide that projects conduct a drainage hydrologic/hydraulic analysis that details the site's anticipated runoff calculations. From these calculations, a WQMP [Water Quality Management Plan] is prepared to ensure that a net increase in stormwater runoff would not occur from implementation of the development. Development projects are required through implementation of a project-specific WQMP to retain and treat the storm water quality volume generated by the project. In addition, the County requires LID standards to reduce runoff by using smart growth practices, stormwater infiltration, evapotranspiration, biofiltration, and rainfall harvest and use.*

The 2011 FEIR and 2018 Willowbrook FEIR do not identify significant impacts to electrical, natural gas or telecommunication facilities.

## Currently Proposed Project

### *Construction and Operation*

The currently Proposed Project would result in a net increase of about 3,345 square feet in floor area but is not anticipated to be as heavily used as the Oasis Clinic see the discussion above regarding traffic -- fewer staff and fewer patients/clients are anticipated. Therefore, the currently Proposed Project would not result in a substantial change in wastewater generation as compared to existing conditions identified in the 2011 FEIR. Similarly, the currently Proposed Project would not generate substantial demand for water. The currently Proposed Project would connect to the existing water and wastewater system and would not include or require the development of major new water or sewer lines.

The currently Proposed Project would not increase in impervious surfaces. Therefore, no additional mitigation would be required and there would be no new or greater impacts to storm drains as compared to those identified in the 2011 FEIR.

The currently Proposed Project would have a less than significant impact on wastewater and water, electrical, natural gas and telecommunication infrastructure, consistent with the evaluation in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes less than significant impacts with respect to water supplies. The estimated MLK Campus water demand on completion of Tier II was calculated to be 442 AFY during a single dry year. The highest demand estimated for Tier II is 473.4 AFY, which would be during a single dry year or the first dry year of multiple dry year conditions. On completion of Tier II, the MLK Campus was estimated to add approximately three percent to the overall projected demand. A Water Supply Assessment for the MLK

Redevelopment Project concluded that there would be sufficient water to meet the anticipated demand from the MLK Campus in addition to other existing and planned future uses in the service territory.<sup>8</sup> The 2011 FEIR concluded that Tier II would result in less than significant impacts with regard to water supply.

The 2018 Willowbrook FEIR indicates that the MLK Campus and area south of Imperial and west of Wilmington is serviced by Liberty Utilities and with respect to their ability to provide water it concludes that:

*Because the Liberty Utilities would have an excess water supply of 910 AFY in excess of their growth projections based on SCAG projected growth, the Specific Plan's increased demand of 527 AFY is able to be accommodated. The proposed project would not require or result in the need for new or expanded water supply entitlements. Therefore, buildout of the proposed Specific Plan would result in a less than significant impact to Liberty Utilities water supply entitlements for an average year.*

## Currently Proposed Project

### Construction and Operation

The currently Proposed Project would result in water consumption within that analyzed in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### Construction and Operation

The 2011 FEIR concludes less than significant impacts with mitigation with respect to wastewater treatment providers (Mitigation Measure Utilities-1, requiring payment of connection fees for the sewer system). Additionally, the 2011 FEIR indicates that although the site is well served by major pipeline infrastructure

<sup>8</sup> County of Los Angeles. July 2010. *Water Supply Assessment for the Martin Luther King, Jr. Inc.*, Los Angeles, CA, p. 8-2.

for wastewater collection, new project related connections associated with Tier II development as a whole could be needed.

The 2018 Willowbrook FEIR includes additional mitigation to ensure adequate trunk sewer capacity. The 2018 Willowbrook FEIR indicates that the Joint Water Pollution Control Plant in Carson has the capacity to absorb development under the Specific Plan:

*[T]he trunk sewers that serve the Specific Plan area are flowing at 12 – 25 percent of their maximum capacity. In addition, the JWPCP has a 400 mgd capacity for primary and secondary treatment and treated an average of 264 mgd in 2013. Therefore, the JWPCP has excess treatment capacity of approximately 136 mgd and would have sufficient capacity to process the additional average wastewater flow of approximately 1.4 mgd that would be generated by the Specific Plan at buildout.*

*Therefore, the proposed Specific Plan would not increase wastewater generation such that the existing capacity at JWPCP would be exceeded, and would, therefore, not require the construction or expansion of existing wastewater treatment facilities, which could cause significant environmental effects.*

## **Currently Proposed Project**

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

The currently Proposed Project would connect to existing sewer lines and is not anticipated to require new sewer facilities. Implementation of Mitigation Measure Utilities -1 and the mitigation measure added by the 2018 Willowbrook FEIR for new development projects would ensure expansion of the sewage system as needed to accommodate needs. Therefore, consistent with the 2011 FEIR, implementation of the currently Proposed Project would result in less than significant impacts with incorporation of mitigation. Therefore, no additional mitigation would be required and there would be no new or greater impacts than those identified in the 2011 FEIR.

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

## 2011 FEIR and 2018 Willowbrook FEIR

### *Construction and Operation*

The 2011 FEIR concludes that impacts related to solid waste would be less than significant with mitigation (Mitigation Measure Utilities-2). Further the 2018 Willowbrook FEIR indicates:

*The proposed Specific Plan would result in new development, infill and redevelopment of land uses that would generate solid waste. All solid waste-generating activities within the County of Los Angeles are subject to the requirements set forth in AB 939 that requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020 development projects pursuant to the Specific Plan would be required to divert 75 percent of solid waste pursuant to AB 341. Disposal of waste generated from implementation of the proposed Specific Plan would be consistent with all state regulations and the policies within the Los Angeles County Integrated Waste Management Plan. Future development under the proposed Specific Plan would comply with all solid waste statutes and regulations. Therefore, impacts associated with conflict with federal, state, or local statutes or regulations related to solid waste would not occur from implementation of the proposed Specific Plan, and there would be no impacts.*

## Currently Proposed Project

### *Construction and Operation*

Consistent with the findings of the 2011 FEIR, the currently Proposed Project would generate new sources of solid waste (construction debris from demolition of the Oasis Clinic and construction of the new building, trash and green waste). Operation of the currently Proposed Project would generate waste that would be within the assumed increases in solid waste for Tier II as a whole analyzed in the 2011 FEIR. Generation of solid waste would be consistent with the analysis in the 2011 FEIR. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

**T. WILDFIRE**

As part of the 2018 *State CEQA Guidelines* updates, new Wildfire checklist questions were added that pertain to projects that are located in, or near, state responsibility areas, lands classified as very high fire hazard severity zones, and other conditions that could pose a hazard with respect to Wildfire. Wildfire impacts of the currently Proposed Project were evaluated based on the 2011 FEIR and the 2018 Willowbrook FEIR. The potential for the currently Proposed Project to result in new or substantially more adverse significant impacts to Wildfire was evaluated in relation to four questions recommended for consideration by the *State CEQA Guidelines*.

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

**2011 FEIR and 2018 Willowbrook FEIR**

*Construction and Operation*

The MLK Campus is within a developed urban area and is not located on or near a state responsibility area or very high fire hazard severity zone. The 2011 FEIR evaluates all related fire protection issues with respect to overall fire protection and public services. Impacts to emergency response plans are evaluated under hazards and no impact was identified.

## **Currently Proposed Project**

### *Construction and Operation*

The currently Proposed Project as a component of the MLK Tier II Project would have less than significant impacts related to fire protection including issues related to wildfires. Therefore, there would be no new or greater impacts than those identified in the 2011 FEIR.

## **U. GROWTH INDUCING IMPACTS**

### **2011 FEIR and 2018 Willowbrook FEIR**

#### *Construction and Operation*

The 2011 FEIR determined that the MLK Project would not result in substantial growth inducing impacts.

Further the 2018 Willowbrook FEIR concludes that development under the Specific Plan would not result in a significant inducement of indirect growth from construction or operation of the proposed uses.

## **Currently Proposed Project**

### *Construction and Operation*

Consistent with the 2011 FEIR, as one component of Tier II development analyzed in the 2011 FEIR, the currently Proposed Project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The currently Proposed Project would entail youth wellness services located in an urban area within the unincorporated area of Los Angeles County. It would be consistent with permitted uses and densities called for by the Specific Plan and General Plan designation of the site. Additionally, the currently Proposed Project would be located in close proximity to various public transportation opportunities.

The currently Proposed Project would employ about 15 staff. Overall, as with the 2011 FEIR, the currently Proposed Project would not result in an increase in the population that could tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the currently Proposed Project would not result in significant growth-inducing impacts.

The currently Proposed Project would be built in an existing urban setting and served by existing infrastructure and adjacent streets. The currently Proposed Project would not provide through access to

vacant undeveloped parcels whose development potential could otherwise be enhanced, nor would it require extending or improving infrastructure in a manner that would facilitate off-site growth.

Overall, the currently Proposed Project would not remove obstacles to population growth, result in an increase in the population that may tax existing community service facilities, or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, as discussed in the 2011 FEIR, the currently Proposed Project would not result in significant growth-inducing impacts.

## V. MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory Findings of Significance were evaluated with respect to the 2011 FEIR, the 2018 Willowbrook FEIR and three questions.

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

### 2011 FEIR and 2018 Willowbrook FEIR

The 2011 FEIR concluded that the MLK Project would have significant impacts with respect to the issue areas identified below.

- **Air Quality** -- *Construction*: Emissions would exceed regional daily thresholds for VOCs and NOx and localized thresholds for NOx, PM2.5 and PM10 -- based on assumed equipment use and distance to sensitive receptors. *Operations*: Emissions would exceed regional daily thresholds for VOCs, NOx, CO and PM10.
- **Cultural Resources** -- Impacts to the Martin Luther King, Jr. Medical Center Campus Historic District, MACC, Augustus F. Hawkins Comprehensive Mental Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium (Hudson Auditorium) as a result of Tier II. The

demolition/removal of these historical resources was identified as a significant and unavoidable impact.

- **Greenhouse Gases** -- Potential GHG emission impacts associated with construction and operation of Tier II would be significant and unavoidable.
- **Construction Noise** – The 2011 FEIR indicates that construction noise levels would exceed the 75 dBA permissible level at residences that are within 80 feet of the MLK Project construction. Therefore, noise impacts from construction, while temporary, were identified as significant and unavoidable.

Similarly, the 2018 Willowbrook FEIR found significant impacts with respect to air quality, cultural resources (historical resources), and greenhouse gas emissions. In addition, the 2018 Willowbrook FEIR found significant impacts to traffic impacts as a result of the large amount of development planned for the Specific Plan area.

The 2011 FEIR did not find that the MLK Project had the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California prehistory.

### Currently Proposed Project

The currently Proposed Project relates to each of the significant impacts identified in the 2011 FEIR as follows:

- **Air Quality** -- *Construction:* Demolition, site preparation, and construction activities associated with the TAY Drop-In Center would result in peak daily emissions within those analyzed in the 2011 FEIR. *Operations:* On completion of Tier II, the currently Proposed Project would be a part of a net increase in trips that could contribute to a significant impact associated with operation of the overall MLK Campus on completion of the overall MLK Redevelopment Project.
- **Cultural Resources** -- The currently Proposed Project would not contribute to identified impacts.
- **Greenhouse Gases** -- The currently Proposed Project would be one component of the overall MLK Project and would contribute to total GHG emissions on completion of all Tier II projects.
- **Construction Noise** – The nearest residential land use to the currently Proposed Project is the apartment building approximately 140 feet to the northeast; since that apartment building is adjacent to the North Parking Structure site (the parking structure would be approximately 50 feet from the apartment building) that could be constructed at the same time as the currently Proposed Project

impacts of the two projects were evaluated together. Residences within 80 feet of construction activities could be significantly impacted.

The currently Proposed Project would not substantially contribute to the additional traffic impacts identified in the 2018 Willowbrook FEIR.

The significant impacts identified in the 2011 FEIR have the potential to degrade the quality of the environment. No additional mitigation has been identified and there would be no new or greater impacts than those identified in the 2011 FEIR and 2018 Willowbrook FEIR with respect to these issue areas.

The currently Proposed Project would not increase impacts compared to those analyzed in the 2011 FEIR and therefore similarly would not substantially impact the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California prehistory.

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

### 2011 FEIR and 2018 Willowbrook FEIR

Both the 2011 FEIR and 2018 Willowbrook FEIR encompass a large number of individual development projects and therefore the analyses in each document are by nature cumulative. The MLK Project is wholly contained within the 2018 Willowbrook FEIR. Impacts of construction of simultaneous components of the MLK Project is all part of the specific project analysis in the 2011 FEIR and is not considered cumulative. The Charles Drew University has a project (92,618 square foot Health Professions Education Building) in the immediate vicinity of the MLK Project but impacts of that project are not anticipated to substantially add to impacts identified in the 2011 FEIR and they would be within the impacts identified in the 2018 Willowbrook FEIR. Other than the significant impacts identified above, the 2011 FEIR did not identify any other impacts that would be individually limited, but cumulatively considerable.

### Currently Proposed Project

All impacts associated with the currently Proposed Project would be within those analyzed in the 2011 FEIR and therefore would not result in individually limited impacts that could be cumulatively considerable.

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

### 2011 FEIR and 2018 Willowbrook FEIR

The four significant impacts identified above that were analyzed in the 2011 FEIR as well as the significant traffic impacts identified in the 2018 Willowbrook FEIR would have the potential to cause substantial adverse effects on human beings, either directly or indirectly.

### Currently Proposed Project

The currently Proposed Project would not require additional mitigation or result in new or greater impacts than those identified in the 2011 FEIR with respect to adverse effects to human beings.

## W. CONCLUSION

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

**Section 3** discusses issue-by-issue how the impacts anticipated for the currently Proposed Project would be within those previously identified in the 2011 FEIR. The Mitigation Monitoring Program (MMP) adopted

with the 2011 FEIR as well as the Mitigation Monitoring and Reporting Plan (MMRP) adopted with the 2018 Willowbrook FEIR would apply as appropriate to the currently Proposed Project to ensure that all impacts are reduced as necessary and feasible.

As discussed throughout this 6<sup>th</sup> Addendum (see in particular the summary presented in **Table 4**), the currently Proposed Project would result in environmental impacts within those analyzed for Tier II development for every issue with implementation of applicable mitigation measures as included in the adopted MMP for the MLK Project.

## 4. REFERENCES

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County of Los Angeles, *Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment Final Environmental Impact Report*, certified October 11, 2011 (SCH No. 2010031040).

County of Los Angeles, *Willowbrook Transit Oriented Development (TOD) Specific Plan*, approved September 2018 and *Willowbrook Transit Oriented Development Programmatic FEIR*, certified September 2018 (SCH No. 2015101106).

## 5. REPORT PREPARATION

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### A. LEAD AGENCY

County of Los Angeles  
Public Works  
Project Management Division I  
Martin Luther King, Jr., Medical Center Projects

Gillian Tiede, PE, Capital Projects Program Manager  
Greg Sagherian, AIA, Senior Project Manager  
Rochelle Campomanes, RA NCARB LEED AP, Capital Projects Manager

### B. CONSULTANTS

Impact Sciences, Inc.  
811 W. 7th Street, Suite 200  
Los Angeles, CA 90017

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

Sirius Environmental  
1478 N. Altadena Drive  
Pasadena, CA 91107

Wendy Lockwood, Principal

KOA Corporation (Traffic)  
1100 Corporate Center Drive, Suite 201  
Monterey Park, CA 91754

Brian Marchetti, Senior Transportation Planner

# JESSICA KIRCHNER, AICP

CEO & Managing Principal



## EDUCATION

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

Bachelor of Arts, Journalism, Rutgers University

## AFFILIATIONS

Association of Environmental Planners, Board Member, Legislative Committee

American Institute of Certified Planners, Certified Planner

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

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

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

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

# BRETT POMEROY

Associate Principal



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

## EDUCATION

Bachelor of Science,  
Natural Science, Loyola  
Marymount University

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

## AFFILIATIONS

Association of  
Environmental Planners  
(AEP)

CEQA and NEPA  
workshops and conferences

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

Completed AERMOD  
Dispersion Modeling  
Training Seminar held by  
Lakes Environmental

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

# Wendy Lockwood

## **Education**

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

## **Professional Affiliations**

Los Angeles Conservancy

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

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

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

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

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities. Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).



## RESUMES

### BRIAN MARCHETTI, AICP

#### SENIOR TRANSPORTATION PLANNER

Mr. Marchetti is a Senior Transportation Planner at KOA, managing traffic impact, access and pedestrian circulation, parking, and transit planning studies. He has 23 years of experience in the industry. He has extensive experience with traffic impact analysis and active transportation studies, with coordination on project CEQA documents, and with on-call planning services for local cities. Mr. Marchetti has produced studies for environmental documentation on multiple projects, ranging from large commercial centers, mixed-use development projects, residential tract developments, public utilities projects, public facility and park projects, institutional and school facility traffic impact and pedestrian access projects, to transit and station interface projects. He is a Member of the American Institute of Certified Planners (AICP), #016504.

#### RELEVANT EXPERIENCE

##### **On-Call Engineering & Planning Services, Glendale, CA**

KOA is providing traffic engineering and transportation planning services to the City of Glendale that include review of traffic impact studies, site access and circulation design reviews, pedestrian circulation studies, parking studies, and transportation modeling analyses. Design efforts include review of site access, off-site traffic improvements, on-site parking layouts, on-site delivery truck loading zones, on-site vehicle, delivery truck and pedestrian circulation. Peer reviews of traffic studies are a particular focus of KOA's efforts on this project, and those reviews include reviews of and comparisons to city-wide and other nearby traffic studies, reviews of study scoping documents, review of applied growth, project trip generation, cumulative projects inclusion, level of service calculations accuracy, and site vehicle and pedestrian access issues. KOA provided these services through task orders issued by the City, and worked directly with City engineering staff to supplement their daily efforts.

##### **West Covina On-Call Engineering Services, West Covina, CA**

KOA is a part of the City of West Covina's engineering department preferred traffic engineering consultant list for traffic impact and parking studies. KOA coordinates directly with the City on the project scoping process during the proposal effort and submits the draft product to the City for review and comment prior to the completion of the study. Current and/or recent project include:

- West Covina Self Storage traffic impact study (424 South Lark Ellen Avenue)
- Toyota of West Covina traffic impact study
- 520 South Lark Avenue traffic impact study
- LA Fitness traffic and parking study
- West Covina Lakes Office Complex Parking Study and Design Study
- West Covina Orange Medical Plaza traffic study
- 1700 West, West Covina Parkway traffic study



#### EDUCATION

Bachelor of Science, Urban & Regional Planning, California State Polytechnic University, Pomona

#### REGISTRATIONS

American Institute of Certified Planners, #016504

#### PROFESSIONAL AFFILIATIONS

American Planning Association, Member

Southern California Planning Congress, Vice President of Communications

Los Angeles County Regional Planning History Association



Brian Marchetti, AICP, Page 2

**West Hollywood Avenues Streetscape TIS, West Hollywood, CA**

Project Manager. KOA assisted the design process for this project by providing input on the probable effects of proposed streetscape elements on traffic flow, parking availability, and area valet operations. KOA used traffic volumes from recent traffic studies, the General Plan, and focused collection of new data, to analyze traffic conditions without and with potential project-related changes at major intersection approaches. KOA provided recommendations on general design issues that could negatively affect traffic without commensurate benefits to bicyclists or pedestrians. KOA was present at design charrettes and meetings with the project advisory group. KOA reviewed proposed sidewalk extension and raised median locations related to the project, to determine potential impacts to major driveway access, pedestrian crossing patterns, and turning movement patterns. A thorough traffic engineering assessment was conducted by KOA to illustrate the trade-offs associated with different alternatives on city streets in terms of traffic delay, alternate mode accommodation and safety. The final report included discussion on project options and differences in roadway operations with related roadway reconfigurations.

**San Gabriel 400-420 West Valley Boulevard TIS, San Gabriel, CA**

Principal-In-Charge. KOA prepared a traffic impact study for the proposed mixed-use project at 400-420 West Valley Boulevard, in the City of San Gabriel. KOA produced previous traffic impact study reports for various land use proposals for the same property. The new proposed project was to be larger, with approximately 20,000 more square feet of commercial area, and approximately 70 more residential units. The project site would include north and south access points, with one of those locations providing direct access into a residential neighborhood. A neighborhood impact analysis of three roadway segment locations was included in the analysis.

**El Segundo Smoky Hollow Specific Plan Traffic/Parking Study**

Principal-In-Charge. KOA provided a traffic/circulation and parking analysis for this Specific Plan Update. The goal was to assist in promoting a new development within the plan area, focusing on high-tech, entertainment and business incubator industries and related support services. This area is transitioning away from the traditional light industrial uses that historically served the local aerospace and oil refinery industries. The City's overall goal for the area, however, is to create a unique mixed-use office/industrial district. KOA conducted a traffic analysis of constraints and subsequent impacts of opportunity sites and/or land use changes, and conducted a parking study to identify the general availability on-street parking and its configurations and regulations. The study examined pedestrian walking routes, transit access via an existing City shuttle service that links corporate areas to the downtown area, and linkages to the existing and future bicycle facility network. KOA made recommendations for improvements to these routes and linkages. An analysis of the downgrading of a Secondary Arterial classification to a commercial collector classification was included in the effort.

**LA Street Civic Building EIR / Parker Center Site**

Project Manager. The City of Los Angeles proposed to redevelop the Parker Center site, which was the former location of the Los Angeles Police Department Headquarters Building. The City needed architectural conceptual designs and an environmental impact report prepared for three potential project alternatives, which included adaptive re-use of the existing building, partial demolition and renovation of the existing building, and demolition of the existing building then replacement with a new one-million square-foot building. KOA's scope of work for this project included preparation of the needed traffic study for incorporation into the EIR document. KOA's traffic impact analysis covered an expansive area of downtown Los Angeles for each of the proposed project alternatives.

**East Los Angeles Specific Plan, Los Angeles, CA**

Project Manager. KOA conducted the traffic and parking analysis for the proposed East Los Angeles Specific Plan, encompassing all properties located within one-half mile radii of the four Metro Gold Line stations, and other targeted parcels between the boundaries of Cesar Chavez Avenue, Indiana Avenue, Whittier Boulevard, and Margaret Avenue. The environmental documentation was to be a program document, identifying potential impacts for buildout of the specific plan area, and the overall cumulative impacts of Specific Plan and area development. The traffic study focus on potential impacts within and adjacent to the proposed mixed-use corridors and related land use intensification, calculation of increased trip generation and related reductions for shared uses, pass-by trips, and transit use, and examination of potential parking demand and recommended parking requirements.

**ATTACHMENT A**  
**Technical Memorandum -- Traffic**

## TECHNICAL MEMORANDUM

Date: July 16, 2024

To: Kent Tsujii, Senior Civil Engineer, Los Angeles County Public Works

From: Brian Marchetti, AICP, Senior Planner

**Subject:** Martin Luther King Jr. Medical Center Campus Redevelopment Final EIR 6<sup>th</sup> Addendum –  
Traffic Analysis for MLK TAY Drop-In Center

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The Los Angeles County Department of Mental Health (DMH) proposes to replace the approximately 6,000-square-foot<sup>1</sup> Oasis Clinic with an approximately 9,345-square-foot Transitional-Age-Youth (TAY) Drop-In Center that would serve the Willowbrook community. The site address is 1807 E. 120<sup>th</sup> Street, Los Angeles, CA 90059 and includes Assessor Parcel Numbers: 6149-017-939, 6149-017-932, 6149-017-913 and 6149-028-015.

The Oasis Clinic is part of the Martin Luther King Jr. Medical Center evaluated in the 2011 Martin Luther King, Jr. (MLK) Medical Center Campus Redevelopment Final Environmental Impact Report (2011 FEIR).<sup>2</sup> While the 2011 FEIR does not contemplate replacement of the Oasis Clinic specifically, it does evaluate an overall increase in floor area of 1,476,010 square feet of hospital-related uses. Trips associated with construction of the TAY Drop-In Center would be within the assumptions of the 2011 FEIR with respect to anticipated construction activity associated with the MLK Campus.

The 2011 FEIR uses the ITE Trip Generation, 8<sup>th</sup> Edition which includes trip generation for medical office of 36.13 trips per 1,000 square feet and transit use of 15%. The Oasis Clinic was a medical office (that was in operation at the time the 2011 FEIR was prepared) and therefore is assumed to have generated approximately 184 trips per day<sup>3</sup>. The Oasis Clinic site is well-served by transit. It is approximately 1,400 feet from the Willowbrook Rosa Parks Light Rail Station that serves both the A Line (formerly Blue Line) and C Line (formerly Green Line). In addition, numerous bus lines run along 120th Street adjacent to the site on the south and Wilmington Avenue about 400 feet to the east.

The TAY Drop-In Center is a relatively new type of facility that was not and is not identified by ITE for purposes of estimating trip generation. It is a facility intended to provide safety and basic support for youth (18 to 25) exiting the foster care system. TAY Drop-In Centers do not operate based on appointments (as is the case with medical clinics), they provide a resource for young adults, a transit-dependent population, to visit at their convenience on their own terms.

Each facility is unique to its circumstances, therefore, usable trip generation rates for TAY Drop-In Centers are not available from other agencies, counts, peer reviewed studies, or other similar projects. Each TAY Drop-In Center is tailored to the individual needs of the communities and clients it serves. Therefore, trip generation at each facility is best estimated based on the population served, and planned services and operations at each facility (see discussion below) rather than a

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<sup>1</sup> The 2011 FEIR identifies the Oasis Clinic as 1,850 square feet in error. DPW has confirmed that the building is approximately 6,000 square feet.

<sup>2</sup> 2011 FEIR, page 2-3 footnote 7: “[t]he Hub Clinic and the Oasis Clinic (new) buildings are located north of the existing 38-acre campus but are considered part of the existing campus structures and operations.”

<sup>3</sup> As noted above, the 2011 FEIR assumes an incorrect building area for the Oasis Clinic and assumes an overall trip generation of 16.5 trips per 1,000 square feet for all existing hospital uses including clinic uses such as the Oasis Clinic. This number is then used to calculate the net increase in trips from proposed net changes to floor area.

standardized trip generation rate. An example of a TAY Drop-In Center is in Hollywood. The Hollywood facility is double the size of the proposed MLK facility, serves a different population, and offers more services than are proposed to be offered at the MLK facility. Several young adults from the Willowbrook community currently travel 1.5 hours on transit to use the Hollywood TAY Drop-In Center. It is anticipated that some of these users will transfer to the much closer MLK TAY Drop-In Center even though it will have fewer services.

The proposed TAY Drop-In Center will provide clinical services including mental health, physical health, substance use prevention, as well as supported education and employment, and peer and family support — on their own terms. This new approximately 9,345-square-foot building will be two stories and will include offices, conference facilities, open lounge space, laundry and folding area, showers, group rooms, chat rooms, exam rooms, small cafeteria, and relaxation areas including possibly an atrium.

The clients who use TAY Drop-In services rely on public transportation and do not own cars. Many of them are unhoused. DMH anticipates the facility will generally operate from 1 pm to 8 pm (up to 10 pm if needed) six days per week. Based on their experience, and planned services and operations at this facility, DMH conservatively estimates that the proposed MLK TAY Drop-In Center will serve about 25 clients per day, all of whom use transit or walk or arrive on a bicycle. DMH is basing estimates of staffing and daily client visits on their experience and planned services to be provided at the facility as well as local knowledge of clients to be served.

DMH plans for the facility to have 10 employees from 1 pm to 3 pm with an additional 5 employees from 3 pm to 8 pm (or 10 pm if needed) for a total of approximately 15 employees per day. Staffing is anticipated to include office hours for physicians and councilors already located on the MLK Campus. Therefore, based on planned operations of this facility, it is conservatively estimated that it will generate two new trips per day per employee, resulting in the TAY Drop-In Center generating an estimated 30 trips per day, 25 trips per day assuming 15% transit use, which would be less than trips from the Oasis Clinic medical office building<sup>4</sup>.

In conclusion, with respect to the traffic analysis included in the 2011 FEIR, replacement of the Oasis Clinic with the TAY Drop-In Center would have negligible effect on trip generation (fewer trips would be generated than considered in the 2011 FEIR). The TAY Drop-In Center would be required to comply with the traffic mitigation measure requiring preparation of a Construction Traffic Management Plan (Measure Traffic-1) but would not trigger any of the approved traffic mitigation measures regarding intersections that are identified in the 2011 FEIR. Therefore, no further analysis of traffic issues is warranted. No changes are proposed to mitigation measures. Mitigation measures for the rest of the MLK Project remain applicable and will be implemented as they are triggered, consistent with County policies.

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<sup>4</sup> Even if the Oasis Clinic were 1,850 square feet it would have generated more trips than anticipated for the Willowbrook TAY Drop-In Center (Oasis Clinic:  $1.85 \times 36.13 = 67$  minus 15% = 57 trips). Using the generic 16.5 trips per 1,000 sf of hospital use that the 2011 FEIR assumes for all existing uses and assuming 1,850 square feet at the Oasis Clinic, the 2011 FEIR assumes about 26 trips from the Oasis Clinic ( $1.85 \times 16.5 = 30.525$  minus 15% = 26 trips). CEQA documents including traffic studies evaluate impacts of projects based on a comparison of impacts with a project compared to existing conditions (not total impacts from a site). The 2011 FEIR calculates net trip generation based on future project trips minus estimated existing trips. By making a simplifying assumption that all hospital-related uses at the MLK Jr. Medical Center generate trips at the lower hospital rate (rather than some uses generating trips at the higher medical office/clinic rate), and by undercounting existing floor area, the 2011 FEIR underestimates existing trips and therefore overestimates the net change in trips due to the project. This results in a conservative analysis.