Division of Land / Environmental Review

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

FINAL ENVIRONMENTAL IMPACT REPORT

NORTHEAST LOS ANGELES COMMUNITY PLAN AREA

USC Health Sciences Campus Project

ENV-2004-1950-EIR
State Clearinghouse No. 2004101084

Council District 14

THIS DOCUMENT COMPRISES THE THIRD AND FINAL PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE DRAFT EIR AND REVISED DRAFT EIR WHICH WAS PREVIOUSLY CIRCULATED FOR PUBLIC REVIEW AND COMMENT COMPRISE THE FIRST TWO PARTS.

Project Address: USC Health Sciences Campus/1510–1520 San Pablo Street
Los Angeles, CA 90033

Project Description: The Project is proposed to occur on seven development sites within the USC Health Sciences Campus (HSC). The seven development sites are identified as Development Sites A through G. The Project consists of the development of between 585,000 and 765,000 square feet of academic and medical research facilities as well as medical clinic facilities. The development sites currently contain surface parking lots and/or are underdeveloped. Parking accommodations to support the proposed academic and medical-related uses are also included as part of the Project. The seven development sites comprise approximately 22 acres within the existing HSC. Actions requested by the applicant include: a General Plan Amendment from Public Facilities to General Commercial for Development Site C; a General Plan Amendment from Limited Industrial to General Commercial for Development Sites E and F; a Zone Change from PF to C2 for Development Site C; a Zone Change for the Development Sites to establish [Q] and/or [D] conditions; a Height District Change from 1VL to 2 for Development Site D; a Zone Change from CM-1 to C2-2 for Development Sites E and F; a Variance from the distance requirement for parking to be provided within 750 feet of the proposed use; the abandonment of Henry Street through either a merger and resubdivision or a street vacation; and possible subdivision actions.

APPLICANT:
University of Southern California

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

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I. SUMMARY

A. INTRODUCTION

In accordance with Sections 15088, 15089, and 15132 of the State Guidelines for the Implementation of the California Environmental Quality Act (the "CEQA Guidelines"), the City of Los Angeles Planning Department, as Lead Agency, has prepared this Final Environmental Impact Report (the "Final EIR") for the USC Health Sciences Project (the "Project").

This Final EIR comprises the third and final part of the Environmental Impact Report (EIR) for the Project. The USC Health Sciences Project Draft and Revised Draft EIRs were previously circulated for public review and comment and comprise the first and second parts of the Project's EIR, respectively. During the Draft EIR's public review period, a comment was received which identified the lack of a solid waste analysis in the Draft EIR. The Initial Study (November 2004) had determined solid waste as an issue requiring further analysis, and the Draft EIR was subsequently revised to include an analysis of the Project's forecasted solid waste generation. The Revised Draft EIR was circulated, pursuant to the provisions of Section 15088.5 of the State CEQA Guidelines, to provide the public an opportunity to review and comment on the solid waste analysis. Further information regarding the Project's review process under CEQA follows in the Executive Summary, Section I.4 "Public Review Process."

The USC Health Sciences Project Draft and Revised Draft EIRs are available for review at the Department of City Planning, Environmental Review Section, 200 North Spring Street, Room 761, Los Angeles, CA 90012.

B. FORMAT OF FINAL EIR

This Final EIR consists of the following four chapters:

I. **Executive Summary.** This chapter describes the purpose of the EIR; the organization of the Final EIR; a description of the Project; the public review process; areas of controversy and issues to be resolved; a summary of the alternatives to the Project as presented in the Draft EIR; and a summary of the Project's environmental impacts and mitigation measures.

II. **Mitigation Monitoring and Reporting Program (MMRP).** The MMRP presented in this chapter is an updated version of that presented in the Draft EIR taking into account all changes and/or additions resulting from comments on the

Draft and Revised Draft EIRs provided by the public. The MMRP is the document that is used by the enforcement and monitoring agencies responsible for the implementation of the Proposed Project's mitigation measures. Mitigation measures are listed by environmental topic. Additional mitigation measures that have been incorporated into the Final EIR as well as the Proposed Project's Initial Study (see Appendix A of the Draft EIR) are included in the MMRP.

III. **Corrections and Additions.** This chapter provides a list of changes that were made to the Draft EIR, based on comments received from the public. Specifically this chapter is comprised of the Solid Waste analysis that was included in the Revised Draft EIR and a text edit to the Land Use Section.

IV. **Comments and Responses.** This chapter presents all comments received by the City during the Draft EIR and Revised Draft EIR 45-day public review periods as well as the responses to those comments.

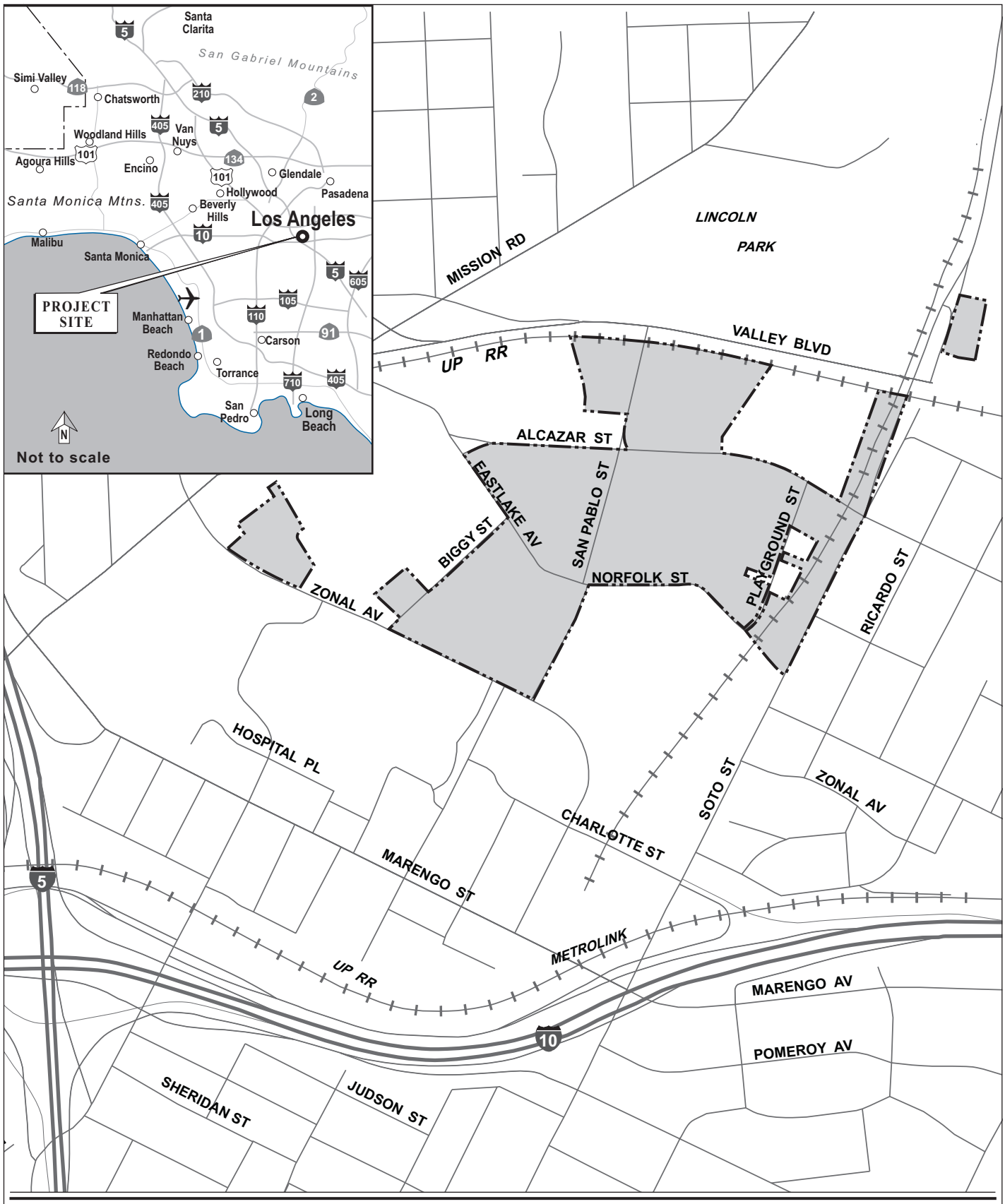
C. PROPOSED PROJECT

1. Background

The proposed Project would be developed within USC's existing Health Sciences Campus (HSC), a state-of-the-art academic and medical research and treatment campus with specific work in the fields of cancer, gene therapy, neurosciences, and transplantation biology, as well as programs in occupational therapy and physical therapy. As an example, the HSC includes the USC/Norris Comprehensive Cancer Center, USC University Hospital, the Zilkha Neurogenetics Institute, the Doheny Eye Institute, the School of Pharmacy, the Keck School of Medicine, the Center for Health Professions, and the Norris Medical Library. In addition to these facilities, the HSC contains ancillary uses that contribute to the ongoing academic and medical related activities that occur at the HSC.

2. Project Location

The HSC is located approximately 3 miles east of downtown Los Angeles, approximately 0.5 mile north of the San Bernardino Freeway (I-10) and approximately 0.5 mile east of the Golden State Freeway (I-5), as shown in Figure 1 on page 3. The HSC is located adjacent to the Lincoln Heights and Boyle Heights neighborhoods of the City of Los Angeles (City) and is within the City's Northeast Los Angeles Community Plan Area, which encompasses that portion of the City east of the Los Angeles River and north of Boyle Heights. The HSC is also located within the Adelante Eastside Redevelopment Project area, which is administered by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA).



Source: PCR Services Corporation, 2005

Figure 1
Regional Location Map

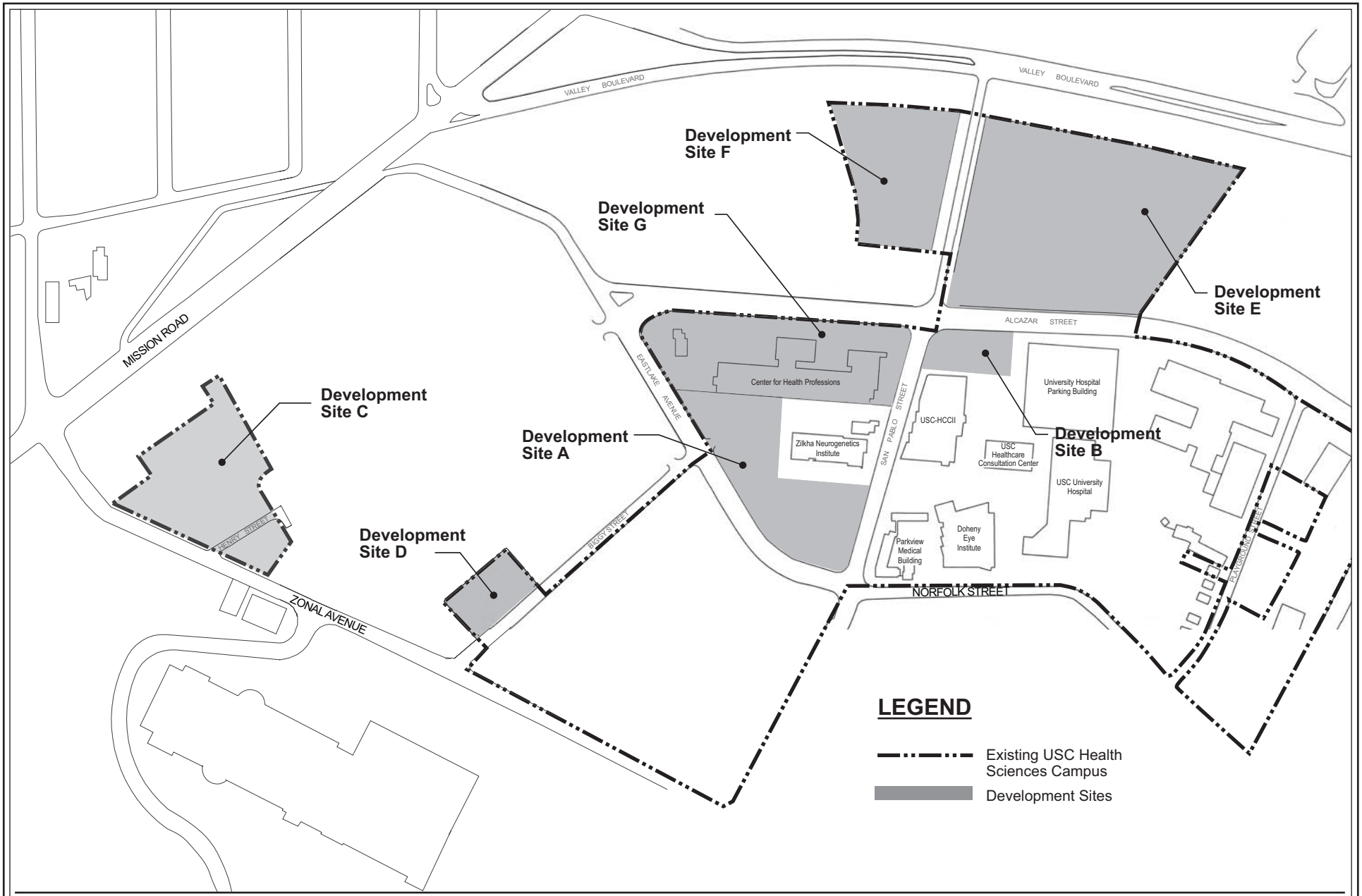
3. Project Characteristics

The proposed Project includes a total of up to 765,000 square feet of development, consisting of 720,000 square feet of academic and medical research facilities, and 45,000 square feet of medical clinic facilities. Additional medical clinic facilities may be developed in lieu of academic and medical research facilities. A maximum of 120,000 square feet of medical clinic floor area is proposed. Should this occur, the amount of academic and medical research facilities would be reduced to 465,000 square feet, for an overall total of 585,000 square feet of development. As such, the Project proposes the development of between 585,000 and 765,000 square feet of floor area. The environmental analysis conducted for the Project addresses the development of the full range of floor area (i.e., 585,000 to 765,000 square feet) and uses (i.e., academic, medical research and medical clinic).

The new facilities that would be constructed under the Project would be utilized by the Applicant for academic facilities, research laboratories and offices, as well as medical clinic space by tenants associated with the HSC. The Project also includes the development of parking facilities to support the proposed academic and medical-related uses. For the purposes of this EIR, the term "Project" is used to refer collectively to the proposed academic and medical-related facilities as well as the proposed parking facilities.

The Project proposes development on up to seven (7) designated Development Sites. The seven Development Sites are hereafter referred to as Development Sites A, B, C, D, E, F, and G, as shown in Figure 2 on page 5 and Figure 3 on page 6 . For the purposes of this EIR, the term "Project Site" is defined to include all seven (7) Development Sites. Development Sites A, B, and G are considered infill sites located within the existing HSC. Development Site C is an existing HSC surface parking lot located on the west side of the HSC. Development Site D is an existing surface parking lot located along the west side of Biggy Street between Zonal and Eastlake Avenues. Development Sites E and F consist of a surface parking lot and a vacant lot located in the northern portion of the HSC on the east and west sides of San Pablo Street, respectively. Project parking could be satisfied by parking facilities within Development Sites B, and/or C, D, E, and F, as well as within existing HSC parking facilities.

Development Site A, which is approximately 2.46 acres in size, is centrally located within the HSC and is part of an 8.06-acre parcel that also includes the Center for Health Professions and the Zilkha Neurogenetics Institute (ZNI). The basement of future building(s) on Development Site A could be designed to connect to the basement of the existing adjacent ZNI building. Development Site B, a 1.13-acre site at the northeast corner of Alcazar and San Pablo Streets, is north of USC Health Care Consultation II and as such is also centrally located within the HSC. Development Site C is located in the western portion of the HSC on the north side of Zonal Avenue, between State Street to the east and Mission Road to the west across from the existing Women and Children's Hospital. This 3.68-acre site is currently used as a 548-space



Source: University of Southern California.

Figure 2
Proposed Development Sites

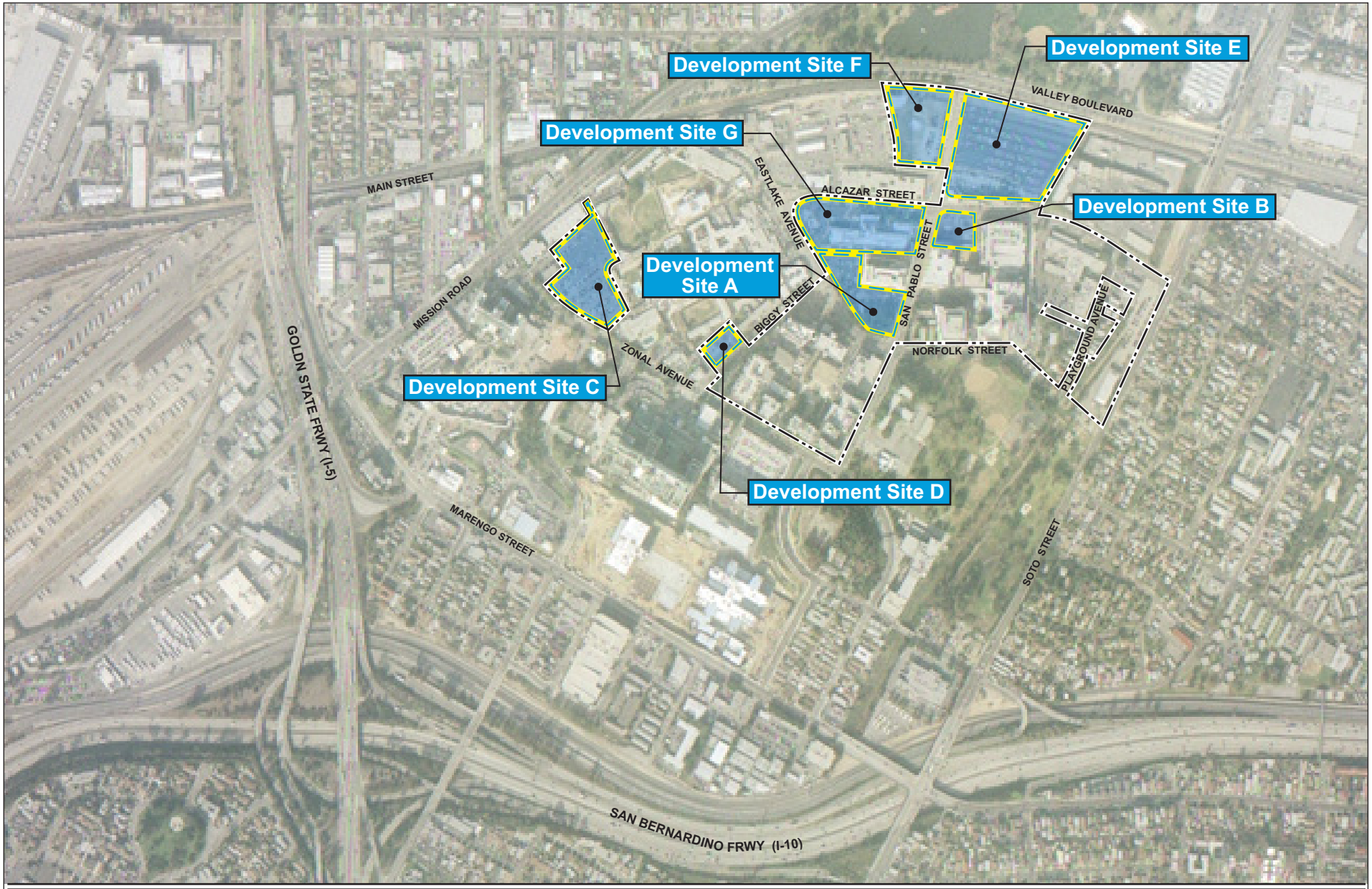


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Figure 3
Aerial View of Campus

Source: Aerial: Landiscore; PCR Services Corporation, 2005

surface parking lot. Development Site D is an approximately 0.77-acre site located on the west side of Biggy Street between Zonal and Eastlake Avenues and is currently used as a 106-space surface parking lot. Development Site E consists of 7.64 acres on the east side of San Pablo Street between Alcazar Street and Valley Boulevard and is currently used as an 826-space surface parking lot. Development Site F consists of 2.65 acres of vacant land on the west side of San Pablo Street. Development Site G comprises approximately 4.0 acres of the larger 8.06-acre parcel that includes Development Site A, the Center for Health Professions, and the ZNI building.

4.Discretionary Actions Requested and Permits Required

a. City of Los Angeles

- Development Agreement
- General Plan Amendment from Public Facilities to General Commercial for Development Site C.
- A General Plan Amendment from Limited Industrial to General Commercial for Development Sites E and F.
- Zone change from PF to C2-2 for Development Site C.
- Zone change for Development Sites A through G to add Q and/or D conditions.
- Zone change from CM-1 to C2-2 for Development Sites E and F.
- Height district change from 1VL to 2 for Development Site D.
- Variance from the distance requirement for parking to be provided within 750 feet of the proposed use (Los Angeles Municipal Code Section 12.21.A.4(g);
- Abandonment of Henry Street through either the merger and resubdivision of Development Site C or a street vacation. In the event that Henry Street is vacated, an amendment to the Northeast Los Angeles Community Plan Generalized Circulation Map would be required to remove Henry Street.
- Haul route; and
- Any other City of Los Angeles permits or approvals as may be required.

Required ministerial approvals from the City of Los Angeles may include, but are not limited to:

- Department of Public Works permits for excavation and shoring in public ways and the installation of public improvements;
- Department of Building and Safety permits including demolition, grading, foundation and building permits; and
- Any other City of Los Angeles ministerial actions or approvals as may be required.

b. Community Redevelopment Agency

- CRA staff review and approval of City of Los Angeles building permit applications; and
- Any other CRA permits or approvals as may be required.

c. State of California and South Coast Air Quality Management District

Required discretionary approvals from the State of California may include, but are not limited to:

- Regional Water Quality Control Board issuance of National Pollution Discharge Elimination System (NPDES) permits for the control of construction runoff water quality;
- South Coast Air Quality Management District permits regarding emergency generators; and
- Any other discretionary actions or approvals from State of California or regional agencies as may be required.

D. PUBLIC REVIEW PROCESS

The City of Los Angeles circulated a Notice of Preparation (NOP) for the proposed Project on October 20, 2004. During the following 30-day comment period, nine (9) letters were received. In addition, a public scoping meeting was conducted on November 4, 2004. The NOP and comment letters received during the comment period, as well as comment sheets from the public scoping meeting, are included in Appendix A of the Draft EIR.

The Draft EIR was circulated for a 45-day review period as required under CEQA[1], from May 26, 2005 to July 11, 2005. In response to a comment received during the public review period, the Draft EIR was revised to include an analysis of the Project's potential solid waste impacts. The Revised Draft was circulated to the public for a 45-day public review period pursuant to CEQA Guidelines Section 15088.5 from August 18, 2005 through October 3, 2005.

Following the public review periods, written responses were prepared on all comments received on both the Draft and Revised Draft EIRs and these comments and responses are incorporated into the Final EIR. No final actions (e.g., approval or denial) will be taken on the proposed Project until the Final EIR has been reviewed, certified as complete, and considered by the appropriate decision-makers. Appendix A of the Final EIR contains the comment letters received during the public review periods for the Draft and Revised Draft EIR.

E. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City include issues known to be of concern to the community and issues raised in the response to the circulated NOP and the Draft EIR as well as the Revised Draft EIR. Issues known to be of concern to the community include traffic, parking, air quality, and noise. The issue of the Project's traffic relative to the Union Pacific at-grade railroad crossing at San Pablo Street, south of Valley Boulevard, was raised during the public scoping meeting. Issues raised in response to the NOP, as well as the Draft EIR, include potential traffic impacts within an area of existing regional congestion, potential air quality impacts in an area of degraded air quality, potential solid waste impacts due to limitations on landfill capacity, potential impacts to Hazard Park and the interface of the proposed Project with the surrounding community.

F. SUMMARY OF ALTERNATIVES

The Draft EIR examined four alternatives to the proposed Project: (1) No Project; (2) Reduced Density; (3) Alternative Land Use; and (4) Alternative Site.

Alternative 1: No Project

The No Project Alternative assumes that the Project would not be implemented and that the existing physical condition of the Project Site and existing uses at the Project Site would remain unchanged. Construction and operation of new academic and medical research facilities, as well as medical clinic facilities, within the HSC would not occur. Furthermore, construction of ancillary facilities such as parking would not occur. Thus, this Alternative reflects existing

[1] *Public Resources Code Section 21091.*

environmental conditions as discussed under the Environmental Setting section for each issue analyzed in this EIR.

The No Project Alternative would avoid the significant, unavoidable traffic, air quality and construction noise impacts associated with the proposed Project. The No Project Alternative's impacts on aesthetics, while not significant, would be greater than the proposed Project because benefits of the Project relative to policies pertaining to aesthetics as set forth in the urban design policies would not be realized. However, the No Project Alternative would not accomplish the Applicant's objectives to assist in achieving USC's goals for the HSC to become one of the nation's very top medical schools and to attract outstanding students and provide them with a rigorous, individually tailored educational experience that trains them as internationally competitive research scientists. Furthermore, support of the basic Project objectives relative to the development of centralized academic, medical research, and medical clinic facilities within the existing HSC would not occur with the No Project Alternative. In addition, the No Project Alternative would not provide the quantity and quality of laboratory space required in order to recruit new, world-renowned faculty, provide for buildout of the existing HSC site required to meet the demand for new programs, or create a pedestrian-friendly campus environment.

Alternative 2: Reduced Density

The Reduced Density Alternative includes the proposed uses as set forth with the Project, but reduces the scale of the development that would occur at the Project Site. On an overall basis, the amount of development is reduced by 30 percent, to reflect the development of between 409,500 and 535,500 square feet of floor area. Should 409,500 square feet of floor area be developed, a total of 325,500 square feet of academic and/or medical research facilities would be developed, and the balance, 84,000 square feet, would be developed with medical clinic uses. In the event on-site development reaches 535,500 square feet, a total of 504,000 square feet of academic and/or medical research facilities would be developed and the amount of medical clinic development would be decreased to 31,500 square feet. The Reduced Density Alternative could be developed at the same seven proposed Development Sites as the proposed Project.

The Reduced Project Alternative would reduce, but not eliminate, the proposed Project's significant traffic, air quality, and construction noise impacts. However, the Reduced Project Alternative would only partially achieve the basic objectives of the Project. The Alternative would support the Applicant's mission to assist in achieving USC's goals for the HSC to become one of the nation's very top medical schools and to attract outstanding students and provide them with a rigorous, individually tailored educational experience that trains them as internationally competitive research scientists. In addition, the Reduced Project Alternative would also support the development of centralized academic, medical research, medical clinic facilities and create an on-site, pedestrian-friendly campus environment. However, since the Reduced Project

Alternative would result in a 30 percent reduction in development, it would support the Project's basic objectives to a notably lesser extent than what would occur under the proposed Project.

Alternative 3: Alternative Land Use

This Alternative assumes the development of the Project Site with an alternative land use. The purpose of this alternative is to analyze a mix of land uses, different than the proposed Project, that would also result in reduced environmental impacts. Construction under this Alternative would consist of academic, medical research and medical clinic uses similar to the Project. However, this Alternative proposes development of a 200-room multi-level hotel facility with a total floor area of 200,000 square feet in lieu of academic, research and medical clinic uses (i.e. reduction of 160,000 square feet of academic and related research uses and a reduction of 40,000 square feet of medical clinic uses). The amount of academic/medical research and medical clinic uses that could occur under this alternative were determined by assuming that the number of vehicle trips generated by the three land use types collectively (i.e. academic/medical research, medical clinic and hotel) would not exceed those of the proposed Project. This alternative is selected because it proposes development of the Project Site with academic and medical related uses and represents a level of development that continues to support the existing facilities on the HSC. The hotel facility associated with this Alternative would house people with family members undergoing treatment at HSC facilities.

Under this Alternative, the Project's significant traffic impacts, after mitigation, under Parking Scenario No. 1 would be unchanged and remain at four, but the number of significant impacts, after mitigation, under Parking Scenario No. 2 would be reduced from three to two.. In addition, under this Alternative, the Project's significant air quality, and construction noise impacts would remain, although they would be less than the proposed Project. Furthermore, the Alternative Land Use Alternative would only partially achieve the Project's basic objectives. The Alternative would support the Applicant's objectives to assist in achieving USC's goals for the HSC to become one of the nation's very top medical schools and to attract outstanding students and provide them with a rigorous, individually tailored educational experience that trains them as internationally competitive research scientists. This Alternative would also support the development of centralized academic, medical research, and medical clinic facilities; and would create an on-site, pedestrian-friendly campus environment. However, since the Alternative Land Use Alternative proposes development of a 200 room multi-level hotel facility in lieu of academic/research and medical clinic uses, it would support the basic objectives of the Project to a lesser extent than what would occur under the proposed Project.

Alternative 4: Alternative Site

This Alternative proposes to locate the Project at a different site as a means of understanding the environmental effects of the Project in a different geographical context. The alternate site selected for analysis is the Women and Children's Hospital site, located along the

east side of Mission Road, generally between Zonal Avenue to the north and Marengo Street to the south in the City of Los Angeles.

Under the Alternative Site Alternative, the Project's significant traffic, air quality, and construction noise impacts would remain. This Alternative's impact on aesthetics would be greater than the proposed Project's, although it would still be less than significant. In addition, this Alternative would only partially achieve the Project's basic objectives. The Alternative would support the Applicant's objectives to assist in achieving USC's goals for the HSC to become one of the nation's very top medical schools and to attract outstanding students and provide them with a rigorous, individually tailored educational experience that trains them as internationally competitive research scientists. However, the Alternative would not support the Project's basic objectives to provide for the development of centralized academic, medical research, and medical clinic facilities which would also facilitate a synergy with existing HSC facilities, nor would the Alternative create an on-site, pedestrian-friendly campus environment, as implementation of this Alternative would not allow for the development of the seven proposed Development Sites which are currently underutilized within the existing HSC.

Environmentally Superior Alternative

State CEQA Guidelines require the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the "No Project Alternative," the identification of an environmentally superior alternative from among the remaining alternatives.[2] An environmentally superior alternative is an alternative to the proposed Project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with a project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the Project.

Selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative. CEQA requires that when the No Project Alternative is the environmentally superior alternative, another alternative needs to be selected as environmentally superior.

Based on the analysis presented in Section V of this Draft EIR, the No Project Alternative would be the environmentally superior alternative. In accordance with the procedure outlined above, the Reduced Density Alternative (Alternative 2) would be the environmentally superior alternative. While selected as the environmentally superior alternative, the Reduced Density Alternative would only partially achieve some of the Project objectives, as the amount of new

[2] *CEQA Guidelines, Section 15126.6(e)(2).*

facilities that would be developed would be lessened. This could potentially inhibit achievement of the Project's broader goals. It should also be noted that, other than the No Project Alternative, no alternatives would reduce the significant, unavoidable impacts, related to traffic, air quality and construction noise to levels that are less than significant.

G. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The environmental impacts and mitigation measures for the proposed Project are summarized below.

1. Land Use

a. Environmental Impacts

Land use plans and policies applicable to the proposed Project include the City of Los Angeles General Plan Framework, the Northeast Los Angeles Community Plan, the Adelante Eastside Redevelopment Plan, and the SCAG Regional Comprehensive Plan and Guide. The Project Site is designated "Community Center" under the General Plan Framework. As such, the proposed Project supports the redevelopment and Community Center policies of these plans as it would: (a) preserve and enhance the existing HSC, a unique institutional resource of the community; (b) improve the quality of life for those who live and work in and visit the area through an expansion of existing HSC facilities; (c) create pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide local identity; and (d) promote pedestrian activity via the design and siting of structures. The Project would also be consistent with the Framework's policies, which encourage development in centers and in nodes along corridors that are served by transit.

The seven proposed Development Sites are located within the established 56-acre HSC, which is developed with similar uses. Furthermore, the height of the proposed structures would not substantially contrast with the surrounding area, since the proposed structures would be consistent in scale with the existing HSC structures, as well as the other nearby institutional and public uses in the vicinity of the Project Site.

The proposed Project would not exceed the land use thresholds of significance in that the interface of the proposed Project's physical and operational characteristics would be substantially compatible with the surrounding land uses; the Project would not result in the division, disruption or isolation of an existing established community or neighborhood; and the Project would be compatible with the applicable land use plans, policies and regulations.

b. Cumulative Impacts

Development of the related projects is anticipated to occur in accordance with adopted plans and regulations. Based on the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the area surrounding the Project site would implement and support important local and regional planning goals and policies. Furthermore, each of these projects would be subject to the project and permit approval process and would incorporate any mitigation measures necessary to reduce potential land use impacts. Therefore, no significant cumulative land use impacts are anticipated.

c. Mitigation Measures

As no significant land use impacts would occur, no mitigation measures are required.

d. Level of Significance after Mitigation

Land use impacts would be less than significant.

2. Visual Resources

a. Environmental Impacts

The aesthetic character of the HSC is that of a contemporary and integrated campus set into an existing urban landscape providing academic, research, hospital and medical office buildings, and parking facilities designed in a modernist style reflective of the high-tech research activity that occurs within these facilities. The surface parking lots that are designated for development currently feature limited landscaping consisting of ornamental trees and landscaping designed as amenities to the streetscape. These sites therefore offer limited aesthetic value to the area.

The existing visual resources that contribute to the aesthetic character of the area include the existing USC Health Sciences Campus buildings and the Los Angeles County–USC Medical Center, which display high-quality architecture and landscaping. Although the proposed Project would substantially change the current appearance of the seven Development Sites when viewed from within the HSC and from the streets immediately adjacent to the Development Sites, the existing vacant and surface parking lots proposed for development feature minimal landscaping and offer limited aesthetic value to the area. It is expected that the buildings that would be developed under the proposed Project would be designed in a style reflective of the existing academic, research and medical office buildings that define the aesthetic appearance of the HSC. Also, the heights of proposed structures would be comparable to the surrounding HSC buildings.

Therefore, the Project would enhance the visual character of the area and would not substantially contrast with, degrade or eliminate the existing visual character of the area.

Shadows cast by the proposed structures during the spring, summer and fall months would not extend onto any of the shadow sensitive uses in the vicinity of the seven proposed Development Sites due to the distance between the Development Sites and the shadow sensitive uses. However, during the winter months shadows cast by the proposed structure(s) on Development Sites E and F may extend onto Lincoln Park. During the winter months, Lincoln Park would only be shaded by the proposed structure(s) on Development Sites E and F for less than two hours, between the hours of 1:00 P.M. and 3:00 P.M. Shadows cast by the other five proposed Development Sites (i.e., Development Sites A, B, C, D and G) would not extend onto any shadow sensitive uses. Therefore, Project impacts to off-site shadow sensitive uses are concluded to be less than significant. Much of the shading on the HSC itself can be attributed to the density and heights of the existing development within the HSC. Shadows cast by the proposed structures would not result in additional shading of on-site shadow sensitive uses. Therefore, impacts with respect to on-site shadow sensitive uses would also be less than significant.

The proposed Project would implement policies of the Adelante Eastside Redevelopment Plan by enhancing the appearance of the seven underutilized Development Sites within the established HSC. With the implementation of Project Design features, which specifically address the City's Urban Design Policies, no significant impacts would occur relative to the applicable policies of the Adelante Eastside Redevelopment Plan. The proposed Project would be consistent with the General Plan Framework's Community Center designation for the Project Site and with the policies regarding urban form, which include promoting pedestrian activity and enhancing the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm. The proposed Project incorporates numerous pedestrian-oriented design features including sidewalks, exterior courtyards and pedestrian walkways. In addition, by incorporating features that support visual amenities and pedestrian-oriented design elements, the proposed Project would be consistent with the goals and policies of the General Plan Framework that pertain to these issues.

Although the signage for the proposed Project has not been finalized at this time, exterior signage for the proposed buildings would be compatible with the design of the existing signage within the HSC. The proposed signs would comply with the Division 62 (Building Code) regulations of the City of Los Angeles Municipal Code (LAMC) with regard to the placement, construction and modification of all exterior signs and sign support structures. As such, impacts associated with visual quality and light and glare during Project operations would be less than significant.

Construction of the proposed Project would involve the demolition and removal of six surface parking lots and one vacant lot within the existing HSC. All trees on those lots and street trees would be removed to allow for the construction of the proposed Project. The removal of street trees would detract from the visual character of the area and would create a temporary potentially significant aesthetic impact. However, upon completion of each building constructed, landscape plantings and trees would be installed along the perimeter of each Development Site, an improvement over existing conditions. All street trees would be replaced according to standard City requirements.

Construction fencing along streets and sidewalks would potentially serve as a target for graffiti, if not appropriately monitored. The Applicant would contract with a graffiti removal company and would monitor each construction site. Although construction activities could temporarily degrade the visual character of the area, such activities would be short-term and, if mitigated and appropriately monitored, the visual impacts of construction would be less than significant.

b. Cumulative Impacts

Several related projects are planned or are under construction in the vicinity of the Project Site. All related projects would adhere to existing General Plan and Community Plan design guidelines via their respective approval processes. Furthermore, it is anticipated that the related projects would be reviewed relative to the valued visual resources in the Project area (e.g., views of the downtown Los Angeles skyline and the distant San Gabriel Mountains, as well as views of both Hazard and Lincoln Parks), and, in doing so, it is anticipated that these view resources would not be significantly impacted. Ultimately, cumulative projects and ambient background growth would upgrade the visual character of the Project area. Continued investment in the surrounding community would meet the goals of the Community Plan and the Adelante Eastside Redevelopment Plan. Pedestrian safety, improved parking, improved campus design, and greater interest in this older community would occur. No significant cumulative impacts upon aesthetic resources or views are anticipated.

c. Mitigation Measures

Specific design standards would be incorporated into the proposed Project to ensure an appropriate physical appearance. Compliance with the following mitigation measures would ensure that the Project would be in scale with the surrounding area and with the City of Los Angeles Urban Design policies and signage regulations.

Mitigation Measure B-1: The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that

any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Mitigation Measure B-2: Building façades facing public streets shall be designed to enhance the pedestrian experience and connectivity of the HSC campus through such features as wide and well-illuminated entry areas, landscaping, and informal gathering space.

Mitigation Measure B-3: Architectural design and exterior building materials shall be compatible with the theme and quality of building design and materials used within the HSC campus.

Mitigation Measure B-4: New utilities shall be constructed underground, to the extent feasible.

Mitigation Measure B-5: Exterior signage for the proposed buildings shall be compatible with the design of the building.

Mitigation Measure B-6: All new or replacement street trees shall be selected for consistency with the existing street trees or in accordance with a street tree master plan reviewed and approved by the Department of Public Works Street Tree Division.

Mitigation Measure B-7: All mechanical, electrical and rooftop equipment shall be screened from view from adjacent surface streets.

Mitigation Measure B-8: Landscaping and/or vegetation features shall be incorporated into the design of each Development Site.

Mitigation Measure B-9: All exterior lighting shall be directed on-site or shielded to limit light spillover effects.

d. Level of Significance after Mitigation

Proposed design features, including the coordination of design with existing HSC structures, landscaping, courtyards, architectural articulation, and pedestrian amenities, which have been incorporated into the Project's building plans, together with recommended mitigation measures would further reduce the Project's less than significant visual resources impacts.

3. Traffic, Circulation, and Parking

a. Traffic and Circulation

(1) Environmental Impacts

The proposed Project is expected to generate 753 vehicle trips (613 inbound trips and 140 outbound trips) during the A.M. peak hour. During the P.M. peak hour, the proposed Project is expected to generate 774 vehicle trips (161 inbound trips and 613 outbound trips). Over a 24-hour period, the proposed Project is forecast to generate 7,715 daily trips during a typical weekday (approximately 3,858 inbound trips and 3,858 outbound trips).

In order to provide a conservative analysis of the Project's potential transportation impacts, two parking scenarios have been developed that reflect the greatest concentration of Project-related traffic on the local roadway system. Parking Scenario No. 1 assumes that parking for the Project would be provided entirely within Development Site C, the west side of the HSC. Parking Scenario No. 2 assumes that parking for the Project would be provided entirely within Development Site E or in combination of Development Sites E and F at the north end of the HSC. Growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors are assumed to be 1.0 percent per year, through 2015. This growth, in addition to known related projects, is added to determine the baseline traffic condition for 2015. Project trips were then added to the baseline condition. Under this methodology, 11 of the 18 study intersections would be significantly impacted by the development of the proposed Project under both Parking Scenario No. 1 and Parking Scenario No. 2. Nine of the 11 impacted intersections are the same under both parking scenarios.

Project impacts with regard to facilities under the jurisdiction of the Los Angeles County Congestion Management Plan would be less than significant. With regard to the Union Pacific crossing on San Pablo Street, south of Valley Boulevard, it is conservatively concluded that a Project-related potentially significant impact could occur during the periods of time when traffic is diverted due to train(s) blocking San Pablo Street. This potential impact is very temporary in nature (i.e., occurring approximately 12 times per day and lasting in duration between less than one and three minutes about half the time and occasionally lasting up to 18 minutes) and would be alleviated once San Pablo Street is available as a through traffic route. With regard to Project access, the intersections that provide access to the Project Site are projected to operate at LOS D or better under the future cumulative analysis conditions (i.e., future with Project and Project mitigation conditions). Thus, Project development would result in a less than significant Project access impact.

As required by the 2004 Congestion Management Program for Los Angeles County, an analysis of potential Project impacts on existing transit service has been conducted. Impacts on

public transit would occur if the seating capacity of the transit system serving the Project study area were exceeded. Given the relatively few number of transit trips generated by the proposed Project, less than significant impacts on existing and future transit service in the Project area are forecasted.

Temporary lane closures are anticipated during Project construction only on streets located within the HSC. It is anticipated that temporary lane closures may occur on San Pablo Street, Alacazar Street, Eastlake Avenue and Zonal Avenue. Construction impacts for these types of streets are normally limited to between 9:00 A.M. and 3:00 P.M. Detours around the construction site(s) as a result of lane closures would not be required. Flag men, however would be used to control traffic movement during ingress or egress of trucks and heavy equipment from the construction site.

Depending upon the specific nature of the construction activity (e.g., demolition, excavation, or concrete pouring), it is assumed the majority of truck traffic would be distributed evenly across the workday. Approvals required by the City of Los Angeles for implementation of the proposed Project include a Truck Haul Route program approved by LADOT and the City's Department of Building and Safety. Based on preliminary review, haul trucks and delivery trucks would generally travel along the I-5 Freeway, I-10 Freeway, Mission Road, Soto Street, Valley Boulevard, and Marengo Street to access and depart the Project Site. With the required haul route approval and other construction management practices, and implementation of construction design features, construction activities would create a temporary inconvenience to auto travelers, bus riders, and pedestrians during construction. Therefore, Project impacts with regard to construction traffic would be less than significant.

(2) Cumulative Impacts

Cumulative effects on intersection operations attributable to traffic from ambient growth and related projects have been incorporated into the above analysis of the future baseline condition. Cumulative growth in the Project area would result in increases in traffic on street and freeway segments in the Project vicinity.

A comparison of 2015 with related project conditions indicates that based on the stated significance thresholds, cumulative development would result in four intersections operating at LOS E or F. It is conservatively concluded that cumulative development would yield a significant cumulative traffic impact on intersection operations at these locations.

It is anticipated that related projects contributing to cumulative growth would be required on an individual basis to mitigate any significant traffic impacts to the extent possible and likely to less than significant levels. Nevertheless, since no guarantee exists that mitigation measures

would be implemented with those projects, it is conservatively concluded that cumulative development would yield a significant cumulative traffic impact on intersection operations.

(3) Mitigation Measures

Eleven of the 18 study intersections would be significantly impacted by the development of the proposed Project under both Parking Scenario No. 1 and Parking Scenario No. 2. Nine of the 11 impacted intersections are the same under both parking scenarios. In response to these significant impacts, the following mitigation measures are proposed under separate subheadings for Parking Scenario No. 1 and Parking Scenario No. 2:

(a) Parking Scenario No.1

Mitigation Measure C-1: Intersection No. 2: I-5 Freeway SB and Mission Road—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the A.M. and P.M. peak commuter hours. Mitigation for this intersection consists of widening the southbound off-ramp to provide an additional lane. The off-ramp would provide one left-turn only lane, one combination left-turn/through lane and one right-turn only lane. A traffic signal modification would also be required.

Mitigation Measure C-2: Intersection No. 3: I-5 Freeway NB Off-Ramp and Daly Street–Main Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the A.M. peak commuter hour. Mitigation for this intersection consists of the installation of a traffic signal at this location.

Mitigation Measure C-3: Intersection No. 6: I-5 Freeway NB On-Ramp and Marengo Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the P.M. peak commuter hour. Mitigation for this intersection consists of the installation of an eastbound right-turn only lane. This measure will involve a lengthening of the red curb along the south side of Marengo Street west of the on-ramp.

Mitigation Measure C-4: Intersection No. 10: Biggy Street and Zonal Avenue—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during both the A.M. and P.M. peak commuter hours. Mitigation for this intersection consists of restriping the southbound approach to provide one left-through lane and one right-turn only lane and restriping the eastbound approach to provide one left-turn lane and one optional through/right-turn only lane.

Mitigation Measure C-5: Intersection No. 12: San Pablo Street and Alcazar Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the A.M. peak commuter hour. Mitigation for this intersection consists of the installation of a traffic signal at the location. Traffic signal warrant analyses have been completed for the intersection.

Mitigation Measure C-6: Intersection No. 14: San Pablo Street and Zonal Avenue—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the P.M. peak commuter hour. Mitigation for this intersection consists of installation of a traffic signal at this location.

Mitigation Measure C-7: Intersection No. 16: Soto Street and I-10 Freeway WB Ramps–Charlotte Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during both the A.M. and P.M. peak commuter hours. Partial mitigation for this intersection consists of the previously City reviewed and approved mitigation measure associated with the HNRT project. The previously reviewed and approved mitigation measure involves the widening of the I-10 Freeway Westbound Off-ramp to provide an additional right-turn only lane. The Preliminary Engineering Evaluation Report document is currently in preparation and will be submitted to the California Department of Transportation for review.

Mitigation Measure C-8: Intersection No. 17: Soto Street and Marengo Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during both the A.M. and P.M. commuter peak hours. Mitigation for this intersection consists of the removal of the raised median islands on Soto Street, north and south of Marengo Street, restriping the northbound and southbound approaches to provide dual left-turn lanes, two through lanes and one combination through/right-turn lane, as well as a traffic signal modification. This measure has only received conceptual approval at this time

Mitigation Measure C-9: Intersection No. 18: Soto Street and I-10 Freeway EB Off-Ramp–Wabash Avenue—The intersection is anticipated to be significantly impacted by Parking Scenario No. 1 during the A.M. peak commuter hour. Mitigation for this intersection consists of restriping Soto Street, south of Wabash Avenue, within the existing roadway pavement width, to provide an additional northbound through lane.

(b) Parking Scenario No. 2

Mitigation Measure C-10: Intersection No. 2: I-5 Freeway SB and Mission Road—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the A.M. and P.M. peak commuter hours. The aforementioned traffic mitigation measure recommended for Parking Scenario No. 1 for the I-

5 Freeway SB and Mission Road intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-11: No. 3: I-5 Freeway NB Off-Ramp and Daly Street–Main Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the A.M. peak commuter hour. The aforementioned traffic mitigation measure recommended for Parking Scenario No. 1 for the I-5 Freeway NB Off-Ramp and Daly Street-Main Street intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-12: Intersection No. 6: I-5 Freeway NB On-Ramp and Marengo Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the P.M. peak commuter hour. The aforementioned traffic mitigation measure recommended for Parking Scenario No. 1 for the I-5 Freeway NB On-Ramp and Marengo Street intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-13: Intersection No. 12: San Pablo Street and Alcazar Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the A.M. and P.M. peak commuter hours. The aforementioned traffic mitigation measure recommended for the Parking Scenario No. 1 for the San Pablo Street and Alcazar Street intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-14: Intersection No. 14: San Pablo Street and Zonal Avenue—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the P.M. peak commuter hour. The aforementioned traffic mitigation measure recommended for Parking Scenario No. 1 for the San Pablo Street and Zonal Avenue intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-15: Intersection No. 15: Soto Street and Alcazar Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the A.M. and P.M. peak commuter hours. Mitigation for this intersection includes the installation of a second northbound left–turn lane and widening along the south side of Alcazar Street, west of Soto Street, to provide a fourth eastbound approach lane (i.e., the eastbound approach would provide one left-turn lane, one combination left-through lane and two right-turn only lanes). A traffic signal modification would also be required.

Mitigation Measure C-16: Intersection No. 16: Soto Street and I-10 Freeway WB Ramps–Charlotte Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during both the A.M. and P.M. peak commuter hours. The aforementioned traffic mitigation measure

recommended for Parking Scenario No. 1 for the Soto Street and I-10 Freeway WB Ramps-Charlotte Street intersection also would be applicable to Parking Scenario No. 2.

Mitigation Measure C-17: Intersection No. 17: Soto Street and Marengo Street—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during both the A.M. and P.M. commuter peak hours. The aforementioned traffic mitigation measure recommended for Parking Scenario No. 1 for the Soto Street and Marengo Street intersection also would be applicable to Parking Scenario No. 2. This measure has only received conceptual approval at this time.

Mitigation Measure C-18: Intersection No. 18: Soto Street and I-10 Freeway EB Off-Ramp–Wabash Avenue—The intersection is anticipated to be significantly impacted by Parking Scenario No. 2 during the A.M. peak commuter hour. Mitigation for this intersection consists of restriping Soto Street, south of Wabash Avenue, within the existing roadway pavement width, to provide an additional northbound through lane.

(c) Construction Traffic (Parking Scenario Nos. 1 and 2)

Mitigation Measure C-19: The Applicant shall prepare and implement a truck/traffic construction management plan.

(4) Level of Significance after Mitigation

After implementation of the above described mitigation measures, the impacts of the proposed Project under Parking Scenario No. 1 upon study intersections during the A.M. and P.M. peak commuter hour would be reduced to less than significant levels for all but four locations. Mitigation measures would reduce impacts to less than significant levels at all but three intersections with implementation of Parking Scenario No. 2.

Under Parking Scenario No. 1, no feasible mitigation measures are available to reduce the traffic impact to a less than significant level at the Soto Street and I-10 Freeway WB Ramps–Charlotte Street intersection (Intersection No. 16) during the P.M. peak commuter hour. Additionally, no feasible mitigation measures are available to reduce the traffic impacts to a less than significant level at the Mission Road and Griffin Avenue–Zonal Avenue intersection (Intersection No. 7) during the A.M. and P.M. peak commuter hours, and at the Mission Road and Daly Street-Marengo Street intersection (Intersection No. 5) during the P.M. peak commuter hour. Since the City of Los Angeles and Caltrans have not formally approved the mitigation measure proposed for the Soto Street and Marengo Street intersection (Intersection No. 17), it is concluded that a significant and unavoidable impact would also occur at this intersection during

both the A.M. and P.M. peak commuter hour. Under Parking Scenario No. 2 no feasible mitigation measures are available to reduce the traffic impact to a less than significant level at the Mission Road and Valley Boulevard intersection (Intersection No. 8) during the A.M. peak commuter hour, and at the Mission Road and Daly Street-Marengo Street intersection (Intersection No. 5) during the P.M. peak commuter hour. Similar to Parking Scenario No. 1, since the mitigation measure proposed for the Soto Street and Marengo Street intersection (Intersection No. 17) has not been formally approved, it is concluded that a significant and unavoidable impact would also occur at this intersection during both the A.M. and P.M. peak commuter hour.

If the mitigation measure proposed for the Soto Street and Marengo Street intersection is approved by the City of Los Angeles and Caltrans then the potentially significant project-related impact under Parking Scenario No. 1 and Parking Scenario No. 2 during both the A.M. and P.M. peak commuter hours would be reduced to a less than significant level. The mitigation for the Soto Street and Marengo Street intersection, which is elevated above the I-10 Freeway and is entirely on a bridge structure, consists of the removal of the raised median islands on Soto Street, north and south of Marengo Street, restriping the northbound and southbound approaches to provide dual left-turn lanes, two through lanes and one combination through/right-turn lane, as well as a traffic signal modification. The traffic signal installation may require a special foundation, given that the intersection is located entirely on a bridge structure. LADOT has conceptually approved this measure, pending review of detailed design (traffic and civil) plans. Construction of the measure would only occur during non-peak hours (between 9:00 A.M. and 3:00 P.M.) during weekdays. It is anticipated that removal of the raised median islands on Soto Street would require the temporary closure of the nearest southbound and northbound travel lanes and that the traffic signal modification would likely occur during the same timeframe. As these mid-day lane closures would not occur during either the A.M. or P.M. peak commuter travel periods and would be short-term in nature (i.e., one to two weeks), potential impacts are concluded to be less than significant.

If it is determined through the design process that a special foundation for the traffic signal poles cannot be installed without structural modification to the bridge, the construction of the measure would involve median removal, roadway restriping, a traffic signal modification and potentially the closure of some I-10 Freeway mainline travel lanes during the off-peak periods. It is anticipated that removal of the raised median islands on Soto Street would require the temporary closure of the nearest southbound and northbound travel lanes and that the traffic signal modification would likely occur during the same time frame. Whereas less than significant impacts, as described above, would result due to the construction of the Soto Street improvements, the bridge reconstruction would likely take several months to complete and potentially require the closure of some mainline I-10 Freeway travel lanes during off-peak periods. Due to the duration of impacts to the I-10 Freeway, implementation of the proposed

Soto Street/Marengo Street intersection improvements may result in a significant secondary impact.

The Project is treated as resulting in a significant impact at the Union Pacific Railroad (UPRR) at-grade crossing on San Pablo Street, immediately south of Valley Boulevard due to the existing intermittent adverse traffic conditions at this crossing. These impacts, however, would be temporary in nature (i.e., occurring approximately 12 times per day and lasting in duration between less than one and three_ minutes about half the time and occasionally lasting up to 18 minutes), and would be alleviated once San Pablo Street is available as a through traffic route. Absent either enforcement of a PUC ordinance that limits the duration that trains can block at-grade crossings or a relocation of the train stoppage to a point east or west of San Pablo Street, the impact of the Project relative to this railroad crossing would be potentially significant and unavoidable. Project impacts relative to the CMP, Project access and public transit would be less than significant.

b. Parking

(1) Environmental Impacts

A net increase of 2,072 parking spaces is calculated for future parking facilities under both Parking Scenario No. 1 and Parking Scenario No. 2. Under Parking Scenario No. 1, parking would be provided only on Development Site C, and under Parking Scenario No. 2, parking would be provided in Development Site E or in a combination of Development Sites E and F. The net increase of 2,072 would exceed the Code requirement of 1,423 to 1,548 spaces, depending on the future mix of developed land uses.

The future parking supply for the USC Health Sciences Campus would increase to approximately 5,870 spaces (i.e., 3,798 existing + 2,072 net future = 5,870 spaces). Thus, the future parking supply of 5,870 spaces is anticipated to satisfy the Project's future Code parking requirement. In addition, based on a peak existing parking demand of 3,132 spaces and a future peak demand of up to approximately 1,985 spaces, a total future peak parking demand of 5,117 spaces (3,132 + 1,985 = 5,117 spaces) would result. As existing parking is sufficient to meet existing demand, and the Project would provide an increase of at least 2,072 spaces, the available parking supply would exceed the HSC's future parking demand. As such, parking impacts would be less than significant.

(2) Cumulative Impacts

The Project in combination with related projects would not result in any adverse impacts to parking. The related projects would be required through Los Angeles Municipal Code

requirements and mitigation measures required by environmental clearances, to include sufficient parking to meet their respective LAMC requirements and to accommodate their own parking demand. No significant cumulative impacts to parking are anticipated.

(3) Mitigation Measures

As no significant impacts relative to parking would occur, no mitigation measures are necessary.

(4) Level of Significance after Mitigation

Impacts relative to parking would be less than significant.

4. Air Quality

a. Environmental Impacts

(1) Construction

Construction of the proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as bulldozers, wheeled loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release emissions of reactive organic compounds. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Construction-related daily (short-term) emissions are expected to exceed SCAQMD significance thresholds for NO_X and ROC. Thus, emissions of these pollutants would result in significant short-term regional air quality impacts. Daily emissions of CO, SO_X, and PM_{10} would be considered adverse, but less than significant, since the levels of these emissions would fall below the SCAQMD significance thresholds. Emission forecasts reflect a specific set of conservative assumptions where the entire maximum entitlement (i.e., 765,000 square feet of floor area and a 2,800-space parking structure) would be built out over a very compressed three-year time period. Because of these conservative assumptions, actual emissions would likely be substantially less than those forecasted. If construction is delayed (i.e., does not start in 2006), or occurs over a longer time period, emissions would be less due to: (1) a more modern and cleaner

burning construction equipment fleet mix; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions would occur over a longer time interval).

Potential maximum CO (1-hour and 8-hour), SO_2 and NO_2 concentrations, when added to background ambient concentrations, would not violate their respective AAQS at any of the 16 sensitive receptor locations. However, the proposed Project would result in localized PM_{10} concentrations during construction that exceed the SCAQMD's 10.4 $\mu g/m^3$ significance threshold at 13 of the 16 sensitive receptor locations. Therefore, construction of the proposed Project would result in a significant and unavoidable impact on localized air quality with respect to PM_{10} concentrations.

Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Given that grading and excavation activities would occur for only three to six months per Development Site, the proposed Project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. As such, Project-related toxic emission impacts during construction would be less than significant.

Odors

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed that would create objectionable odors. Therefore, no significant impact would occur and no mitigation measures would be required.

(2) Operations

Regional Operational Impacts

Regional air pollutant emissions associated with proposed Project operations would be generated by the consumption of electricity and natural gas, by the operation of on-road vehicles, and emergency generators. Regional emissions resulting from the proposed Project would not exceed regional SCAQMD thresholds for ROC, SO_X, CO, or PM_{10}. However, the proposed Project would exceed the regional SCAQMD threshold for NO_X, and impacts associated with this pollutant would be significant.

Local Impacts

Project traffic, during the proposed Project's operational phase, would have the potential to create local area CO impacts.

The proposed Project would not have a significant impact relative to one-hour or eight-hour local CO concentrations due to mobile source emissions. Since significant impacts would not occur at the intersections with the highest traffic volumes that are located adjacent to sensitive receptors, no significant impacts are anticipated to occur at any other locations in the study area as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersections. Consequently, the sensitive receptors that are included in this analysis would not be significantly affected by CO emissions generated by the net increase in traffic that would occur under the proposed Project. As the proposed Project does not cause an exceedance of an ambient air quality standard, the proposed Project's localized operational air quality impacts would therefore be less than significant. In addition, the operation of the proposed Project's parking structure would not cause or localize air quality impacts related to mobile sources and emissions would therefore be less than significant. Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that contributions to localized PM_{10} concentrations remain below the 2.5 $\mu g/m^3$ significance threshold. As such, any potential impacts would be less than significant.

Regional Concurrent Construction and Operation Impacts

The potential exists that the later stages of proposed Project construction could occur concurrently with the occupancy of the earlier stages of development. Therefore, emissions associated with concurrent construction and operation activities were evaluated. Concurrent emissions would be their greatest in the latter stages of proposed Project construction, wherein the proposed Project would be nearly built-out, but some construction activities would still be occurring. Concurrent construction and operational emissions would exceed regional SCAQMD daily thresholds for $NO_{X,}$ and ROC, but would not exceed the regional SCAQMD daily threshold for SO_X. Thus, a significant regional air quality impact due to $NO_{X,}$ and ROC emissions would occur.

Toxic Air Contaminants

The primary source of potential air toxics associated with proposed Project operations include diesel particulates from delivery trucks (e.g., truck traffic on local streets, on-site truck idling and movement and operation of transportation refrigeration units), equipment used to off-load deliveries, boilers (used for water and space heating), and emergency backup generators. These potential sources would be dispersed among the Development Sites (i.e., at multiple loading dock, boiler and emergency backup generator locations).

The proposed Project would not include any notable sources of acutely and chronically hazardous toxic air contaminants, although minimal emissions may result from the use of consumer products. As such, the proposed Project would not release substantial amounts of toxic contaminants; and a less than significant impact on human health would occur.

Odors

The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. The University would employ the same odor control measures used to avoid odor complaints at existing vivariums. Compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less-than-significant level.

(3) SCAQMD Handbook Policy Analysis

As required by the AQMP, an analysis of the proposed Project's pollutant emissions on localized pollutant concentrations is used as the basis for evaluating Project consistency, and localized concentrations for PM_{10}, CO, and NO_x have been projected for the proposed Project. Project consistency with the AQMP is also based on the proposed Project's consistency with the population, housing and employment assumptions used in the development of the AQMP. Overall, the proposed Project would result in less-than-significant impacts with regard to CO, NO_2 and SO_2 concentrations during Project construction and operations. While PM_{10} concentrations during construction would exceed the SCAQMD 10.4 $\mu g/m^3$ significance threshold, the potential for this impact would be short-term and would not have a long-term impact on the region's ability to meet state and federal air quality standards. As such, the proposed Project would meet the first AQMP consistency criterion.

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. As levels of Project employment growth are consistent with the employment forecasts for the subregion as adopted by SCAG, the proposed Project would be consistent with the demographic projections incorporated into the AQMP.

Implementation of all feasible mitigation measures is recommended to reduce air quality impacts to the extent feasible. The Proposed Project would incorporate a number of key air pollution control measures identified by the SCAQMD, as described below. As such, the proposed Project meets this AQMP consistency criterion.

The proposed Project would serve to implement a number of land use policies of the SCAQMD and SCAG. For example, policies directed towards the reduction of vehicle miles traveled and their related vehicular emissions would be implemented by locating the proposed

medical office and research facilities within the existing USC Health Sciences Campus would provide improved opportunities to consolidate and/or eliminate vehicle trips that would otherwise occur if such improvements were built outside of the USC Health Sciences Campus area. As a result, the proposed Project would be consistent with AQMP land use policies.

Overall, the proposed Project is found to be consistent with the AQMP criteria regarding the causing or worsening of an exceedance of an ambient air quality standard. The proposed Project would not delay the attainment of an air quality standard, it would be consistent with the AQMP's growth projections, and it would implement all feasible air quality mitigation measures. Since the Project would be consistent with the AQMP's land use policies, impacts relative to the AQMP would be less than significant.

(4) City of Los Angeles Policies

The Project would be consistent with the Air Quality Element of the City of Los Angeles General Plan. The City Air Quality Element Goals, Objectives and Policies that are relevant to the Proposed Project include less reliance on single occupant vehicles with fewer commute and non-work trips. The Project would be consistent with this goal by locating medical office and research facilities within the existing USC Health Sciences Campus, which would provide improved opportunities to consolidate and/or eliminate vehicle trips that would otherwise occur if such improvements were built outside of the HSC area. USC currently provides a tram/shuttle service on the HSC as well as a service that runs between the University Park Campus and the HSC, Union Station and the HSC, and downtown (to the Executive Health and Imaging Center) and the HSC; and provides carpool and vanpool services and information through its Transportation Services office. In addition, the current HSC location has convenient access to MTA and Foothill Transit bus services, and is located within close proximity to the future MTA Metro Gold Line Light Rail Transit line that is anticipated to be completed by 2009. The proposed Project is therefore considered consistent with this City policy.

In relation to non-work miles, the USC Health Science Campus improvements would be located within walking distance of MTA and Foothill Transit bus lines as well as being in proximity to the proposed Metro Gold Line Extension that is scheduled to be completed by 2009. In addition, USC offers a $25 per month public transportation subsidy to eligible employees that can be applied toward the purchase of a monthly pass for MTA (bus or light rail), LADOT, and Metrolink transit services. Due to these features, a higher percentage of Project-related trips would be "transit trips" than would be the case if the proposed Project were to be located farther away from convenient public transit access.

Other Air Quality Element goals include minimizing the existing land use patterns and future development to address the relationship between land use, transportation, and air quality. The proposed Project would be consistent with this goal since it has incorporated a wide array of

features into its land use plan specifically targeted towards the reduction of vehicle trips and vehicle miles traveled. In addition, development of the proposed Project at the proposed site would offer the opportunity to utilize existing infrastructure to support growth in the Project area. The Project site is well served by transit and has the opportunity to encourage pedestrian activities in this area. Based upon this evaluation, it is concluded that the proposed Project would be consistent with City of Los Angeles air quality policies as it implements in a number of ways the air quality goals and policies set forth within the City's General Plan.

b. Cumulative Impacts

Construction

Of the 14 related projects that have been identified within the proposed Project study area, there are 9 related projects that have not already been built or are currently under construction. With the exception of the USC HNRT building that is currently under construction, the Applicant has no control over the timing or sequencing of the related projects, and as such, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. For this reason, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured.

With respect to the Project's construction-period air quality emissions and cumulative Basin-wide conditions, construction-period NO_X and ROC mass regional emissions, and localized PM_{10} emissions associated with the proposed Project are projected to result in a significant impact to air quality. In addition, there is a high probability that construction-period CO and PM_{10} mass regional emissions from related projects, when combined with proposed Project emissions, would exceed their respective SCAQMD daily significance thresholds. As such, cumulative impacts to air quality during proposed Project construction would be significant and unavoidable.

Similar to the proposed Project, the greatest potential for TAC emissions at each related project would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Given that grading and excavation activities would occur for only three to six months per construction site, the proposed Project and the related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Furthermore, any related project that has the potential to emit notable quantities of TACs would be regulated by the SCAQMD such that TAC emissions would be negligible. Thus, TAC emissions from the related projects are anticipated to be less

than significant unto themselves as well as cumulatively in conjunction with the proposed Project.

Also similar to the proposed Project, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the proposed Project.

Operation

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative operational air quality impacts. The SCAQMD's methodology differs from the cumulative impacts methodology employed elsewhere in this Draft EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured. The SCAQMD's approach for assessing cumulative impacts is based on the SCAQMD's AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. Based on the SCAQMD's methodology (presented in Chapter 9 of the *CEQA Air Quality Handbook*), development of the proposed Project would have a less-than-significant air quality impact. In addition, a localized CO impact analysis was conducted for cumulative traffic (i.e., related projects and ambient growth through 2015) in which no local CO violations would occur at any of the studied intersections. Despite these conclusions, the proposed Project is more conservatively concluded to contribute to a significant cumulative regional air quality impact as the Basin is non-attainment for ozone and PM_{10}, and the proposed Project would exceed the SCAQMD daily significance thresholds for ozone precursor emissions (i.e., ROC and NO_X).[3]

With respect to TAC emissions, neither the proposed Project nor any of the related projects (which are largely residential, restaurant, retail/commercial, and medical/research developments) would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing and transportation hub facilities. As such, cumulative TAC emissions during long-term operations would be less than significant.

[3] *This approach is more conservative than the approach provided in the SCAQMD CEQA Air Quality Handbook.*

With respect to potential odor impacts, neither the proposed Project land use nor any of the related projects' (which are primarily hospital/medical office, general office, residential, retail, and restaurant uses) land uses have a high potential to generate odor impacts.[4] Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant unto themselves, as well as cumulatively, in conjunction with the proposed Project.

c. Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the proposed Project's air quality impacts to the extent feasible.

(1) Construction

Mitigation Measure D-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.[5]

Mitigation Measure D-2: Disturbed areas shall be watered three times daily, which is above and beyond the SCAQMD Rule 403 requirement to water disturbed areas two times daily.

Mitigation Measure D-3: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure D-4: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would turn their engines off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure D-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible.

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[4] *According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.*

[5] *SCAQMD Rule 403 requirements are detailed in Appendix C.*

Mitigation Measure D-6: All construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site.

Mitigation Measure D-7: Project heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible.

Mitigation Measure D-8: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations**.**

(2) Operational Impacts

During the operational phase, the proposed Project would result in regional emissions that exceed regional SCAQMD significance thresholds for NO_X and ROC. Long-term mobile source emissions associated with the proposed Project shall be reduced through the following transportation systems management and demand management measures.

Mitigation Measure D-9: The Applicant shall provide public education to USC Health Science Campus visitors and employees regarding the importance of reducing vehicle miles traveled and utilizing transit, and the related air quality benefits through the use of brochures and other informational tools.

Mitigation Measure D-10: The Applicant shall, to the extent feasible, schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

Mitigation Measure D-11: The Applicant shall coordinate with the MTA and the City of Los Angeles Department of Transportation to provide information with regard to local bus and rail services.

d. Level of Significance after Mitigation

(1) Construction Impacts

Project construction would not result in regional emissions that exceed SCAQMD regional significance thresholds for CO, PM_{10}, and SO_X, and as such, impacts with respect to these pollutants during construction would be less than significant. With respect to NO_X and ROC emissions during construction, mitigation measures would reduce these emissions, but a significant impact would still occur.

Local air quality impacts (i.e., pollutant concentrations) during construction with respect to CO, SO_2, and NO_2 would be less than significant. With respect to localized PM_{10} concentrations during construction, prescribed mitigation measures would reduce the projected maximum concentrations by 8 percent to 38 percent. Nevertheless, the proposed Project would still result in localized PM_{10} concentrations during construction that exceed the SCAQMD significance threshold at 13 of the 16 sensitive receptor locations. Therefore, construction of the proposed Project would result in a significant and unavoidable impact on localized air quality with respect to PM_{10} concentrations.

(2) Operational Impacts

During the operational phase, the proposed Project would result in regional emissions that exceed the SCAQMD significance threshold for NO_X. Mitigation measures identified above would reduce the potential air quality impacts of the Project to the degree technically feasible, but NO_X mass daily emissions would remain above the SCAQMD significance threshold. Therefore, operation of the proposed Project following construction would have a significant and unavoidable impact on regional air quality with respect to NO_X mass daily emissions. Operational emissions would not exceed the SCAQMD significance threshold for CO, ROC, PM_{10}, and SO_2, and, thus, impacts are concluded to be less than significant for these pollutants.

No significant impacts related to local CO concentrations are forecast to occur for the proposed Project. Project development would be consistent with the SCAQMD's AQMP, and the City's General Plan Air Quality Element resulting in an impact that is less than significant.

The proposed Project is not anticipated to include any notable TAC emissions sources. However, as previously discussed, any potentially significant TAC emission sources would be required to comply with SCAQMD Rule XIV (New Source Review of Air Toxics). As such, potential impacts from proposed Project TAC emissions would be less than significant.

Via compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines, potential impacts that could result due to potential odor source(s) would be less than significant.

5. Noise

a. Environmental Impacts

(1) Construction Noise

<u>Construction</u>

Noise disturbances in those areas located adjacent to each of the seven proposed Development Sites can be expected during construction. These disturbances would occur during site preparation activities and the subsequent construction of on-site structures.

As with most construction projects, construction would require the use of a number of pieces of heavy equipment such as bulldozers, backhoes, cranes, loaders, and concrete mixers. In addition, both heavy- and light-duty trucks would be required to deliver construction materials to and export construction debris from each construction site. The timing and location of development proposed as part of the Project would be determined based on the availability of funding sources. In order to provide a conservative analysis it is assumed that construction activity could occur on any of the seven proposed Development Sites at any time. Specifically, the maximum potential construction noise impact at each sensitive receptor location was calculated by assuming that all seven Development Sites could undergo concurrent construction activity. The maximum L_{eq} daytime noise level increases with proposed Project construction are expected to range from 0.2 dBA to 16.6 dBA L_{eq} (1-hour). Construction-period noise impacts would meet or exceed the 5-dBA significance criterion at six sensitive receptor locations (i.e., USC University Hospital, USC HCCI, USC HCCII, Doheny Eye Institute, Women and Children's Hospital, and Hazard Park), and as such, impacts would be significant without the incorporation of mitigation measures.

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally travel to the Project Site via Soto Street from the Interstate 10 Freeway. Although residential uses are present on the east side of Soto Street, construction traffic would not be present during the noise-sensitive late evening and nighttime hours. As such, potential impacts would be less than significant, and no mitigation measures are necessary.

(2) Operation Noise (Post-Construction)

Roadway Noise

The two Parking Scenarios upon which the traffic analysis was based were analyzed to ascertain maximum potential roadway noise impacts. Under all other development scenarios, roadway noise impacts would be less since traffic volumes would be dispersed over a larger area. Under Parking Scenario No. 1, the largest Project-related traffic noise impact is anticipated to occur along the segment of Zonal Avenue, between Biggy Street and San Pablo Street. Project-related traffic would add 1.0 dBA CNEL to this roadway segment. As the incremental Project-related traffic noise level increases at all other analyzed locations would be less than 1.0 dBA CNEL, and these noise level increases are less than the 5-dBA CNEL significance threshold, the

proposed Project's roadway noise impacts are considered less than significant under Parking Scenario No. 1.

Under Parking Scenario No. 2, the largest Project-related traffic noise impact is anticipated to occur along the segment of San Pablo Street, between Alcazar Street and Valley Boulevard. Project-related traffic would add 1.9 dBA CNEL to this roadway segment. As the incremental Project-related traffic noise level increases at all other analyzed locations would be less than 1.9 dBA CNEL, and these noise level increases are less than the 5-dBA CNEL significance threshold, the proposed Project's roadway noise impacts are considered less than significant under Parking Scenario No. 2.

Stationary Point Source Noise

With the exception of Development Site C (site of an up to 2,800-space parking facility), the six remaining Development Sites would require mechanical equipment such as boilers, chillers, pumps, and emergency generators to support proposed structures. Such mechanical equipment is capable of generating high noise levels. However, project design features would ensure that all equipment noise levels comply with City of Los Angeles Noise Ordinance requirements, for both daytime (65 dBA) and nighttime (60 dBA) operation at the property line. In addition, implementation of project design features would ensure that any noise level increase remains below the 5-dBA significance threshold. As such, impacts would be less than significant, and no mitigation measures are required.

The six remaining Development Sites would all likely require a loading dock and refuse collection/recycling area, which is capable of generating a noise level as high as 75 dBA (50-foot reference distance). Most of the neighboring land uses and buildings present in areas that may potentially be affected by noise from such loading dock and refuse collection/recycling areas are located within the existing Health Sciences Campus. As such, through innovative site planning and project design features, the Applicant is anticipated to avoid potential noise impacts so as not to excessively disturb its own adjacent operations, employees and tenants. The exceptions are the neighboring land uses that surround Developments Sites E and F to the north, east and west; and the land uses that are located north, west and south of Development Site D.

Lincoln Park is located north of Development Sites E and F, and as such, could potentially be impacted by loading dock/refuse collection area noise. However, this area already experiences relatively high noise levels due to roadway traffic volumes along Valley Boulevard and railroad traffic along the Union Pacific tracks that run adjacent to Valley Boulevard. Potential impacts associated with the Project at neighboring land uses that surround Development Sites E and F would be less than significant, and no mitigation measures are necessary.

The areas located immediately north and west of Development Site D consist of Juvenile Hall uses that could potentially be impacted by nearby loading dock/refuse collection area activities since such noise levels would be clearly perceptible in comparison to the ambient noise level of approximately 65 dBA at this location. As such, potential impacts to these areas may be significant without incorporation of the mitigation measures.

Various noise events would also occur within the proposed parking structures and surface parking lots. The activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals would occur periodically. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events, which generate maximum noise levels as high as 69 dBA at a reference distance of 50 feet, would occur less frequently. The composite noise level of 60 dBA L_{eq} (1-hour) at a reference distance of 50 feet was used to represent the average parking facility-generated noise level.

With the exception of Development Sites A and G, a multi-level parking facility or surface parking lots could be constructed on any of the remaining Development Site locations. As potential noise level increases would be less than the 5-dBA significance threshold at areas adjacent to all potential Development Site locations, impacts would be less than significant and no mitigation measures are required.

The proposed Project may include one or more buildings that would require an emergency helipad pursuant to LAMC requirements.[6] As such, these helipads would be used for emergency purposes only. Due to infrequent and the emergency nature of that use, adverse noise impacts related to helipad uses would be less than significant.

The potential composite noise level impact at each sensitive receptor location was evaluated by assuming that each of the seven Development Site locations would generate a steady-state equivalent noise level of 70 dBA at a 50-foot reference distance. This 70 dBA (per Development Site) composite noise level would account for each of the individual noise sources (i.e., mechanical equipment, loading dock/refuse collection areas, parking facility, etc.) present on each Development Site. Operations-period composite noise level impacts would not exceed the 5-dBA significance criterion at any sensitive receptor locations, and as such, impacts would be less than significant.

[6] *City of Los Angeles Municipal Code Section 57.118.12 requires that buildings over 75 feet in height be equipped with an emergency helipad.*

b. Cumulative Impacts

All of the identified related projects have been considered for the purposes of assessing cumulative noise impacts. The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network.

Construction Noise

Of the 14 related projects that have been identified within the proposed Project study area, there are 9 related projects that have not already been built or are currently under construction. With the exception of the USC HNRT building that is currently under construction, the Applicant has no control over the timing or sequencing of the related projects, and as such, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise for the proposed Project and each related project (that has not already been built) would be localized. In addition, it is likely that each of the related projects would have to comply with the local noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require significant impacts to be reduced to the extent feasible.

Three nearby related projects (i.e., the Los Angeles County Medical Center, Tenet Acute Care Tower, and USC HNRT) currently under construction are either on or immediately adjacent to the USC Health Sciences Campus. If these projects are still under construction during proposed Project construction, noise-sensitive uses on or adjacent to the HSC (e.g., LA County–USC Hospital) may experience a marginal noise level increase during construction due to concurrent construction. However, each project would be required to comply with the local noise ordinance, and mitigate impacts to the extent feasible. Nevertheless, since noise impacts due to construction of the proposed Project would be significant on its own, noise impacts due to construction of the proposed Project in combination with any of the related projects would also be significant.

Long-Term Operations

Each of the 14 related projects that have been identified within the general Project vicinity would generate stationary-source and mobile-source noise due to ongoing day-to-day operations. The related projects are of a residential, retail, commercial, or institutional nature and these uses are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that are capable of generating a roadway noise impact. Cumulative traffic volumes would result in a maximum increase of 2.6 dBA CNEL along San Pablo Street, between Alcazar Street and Valley Boulevard. As this noise level increase would be below the most conservative 3-dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant.

Due to Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason on-site noise produced by any related project would not be additive to Project-related noise levels. As such, stationary-source noise impacts attributable to cumulative development would be less than significant.

c. Mitigation Measures

(1) Construction

As noise associated with on-site construction activity would have the potential to result in a significant impact, the following measure is prescribed to minimize construction-related noise impacts:

Mitigation Measure E-1: Prior to the issuance of any grading, excavation, haul route, foundation, or building permits, the Applicant shall provide proof satisfactory to the Building and Safety Department and Planning Department that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday, and that a noise management plan for compliance and verification has been prepared by a monitor retained by the Applicant. At a minimum, the plan shall include the following requirements:

1. Pile drivers used in proximity to sensitive receptors shall be equipped with noise control having a minimum quieting factor of 10 dB(A);

2. Loading and staging areas must be located on site and away from the most noise-sensitive uses surrounding the site as determined by the Department of Building and Safety;

3. Program to maintain all sound-reducing devices and restrictions throughout the construction phases;

4. An approved haul route authorization that avoids noise-sensitive land uses to the maximum extent feasible; and

5. Identification of the noise statutes compliance/verification monitor, including his/her qualifications and telephone number(s).

(2) Operational

Portions of the Los Angeles County Juvenile Hall property that abuts Development Site D to the north and west could potentially be exposed to noise level increases that exceed the 5-dBA significance threshold if a loading dock/refuse collection area is located on Development Site D. As such, the following mitigation is prescribed:

Mitigation Measure E-2: If a loading dock/refuse collection area is proposed to be located on Development Site D, the Applicant shall be required to submit evidence, prior to the issuance of building permits for Development Site D, that is satisfactory to the City of Los Angeles Department of Building and Safety that noise level increases do not cause the baseline ambient noise level to increase beyond the 5-dBA significance threshold at any adjacent property line. This mitigation measure does not apply to development that may occur on Development Sites A, B, C, E, F, and G.

d. Level of Significance after Mitigation

(1) Construction

Most of the land uses present in areas that may potentially be affected by noise during construction are located within the existing Health Sciences Campus. As such, the Applicant can be expected to schedule construction activities so as to minimize impacts on its own adjacent operations, employees and tenants.

The mitigation measure recommended in this section would reduce the noise levels associated with construction activities to some extent. However, these activities would continue to substantially increase the daytime noise levels at nearby noise-sensitive uses by more than the 5-dBA significance threshold. As such, noise impacts during construction would be considered significant and unavoidable.

(2) Operations

With implementation of Mitigation Measure E-2 described above, Project development would not result in any significant noise impacts during long-term operations.

6. Utilities and Service Systems

a. Water

(1) Environmental Impacts

During construction, water would be used for dust suppression, the mixing and pouring of concrete, and other construction-related activities. The majority of water use during construction would be associated with dust suppression of excavated sites. This is generally performed by water trucks which derive non-potable water from offsite sources. As such, the impact on treated water from the DWP would be incrementally small and the impact on adjacent water conveyance systems. As such, no significant impact is anticipated to occur due to Project construction activities because the water demands associated with construction activities would not exceed available supplies or distribution infrastructure.

Lateral lines would be constructed from each Development Site to the existing mains in the street right-of-way. Each Development Site would require one service for domestic water and one water line for fire sprinkler and suppression systems. All water improvements within the public right-of-way would be constructed by LADWP. Impacts due to construction of water services include minor temporary traffic lane disruption during trenching, laying of pipe, backfilling, and street resurfacing. Although not within the authority of the Project, standard practices and procedures, including traffic control, are generally implemented by LADWP during construction to reduce the impact to the community to less than significant levels.

A Water Supply Assessment (WSA) has been reviewed and approved by the LADWP, in accordance with the State regulations and the LADWP Urban Water Management Plan (UWMP)[7]. The WSA evaluates the reliability of existing and projected water supplies, as well as alternative sources of water supply and how they would be secured if needed. The WSA is also consistent with the LADWP Urban Water Management Plan (UWMP). Domestic water would be required for research laboratories, restrooms, drinking fountains, landscaping, and incidental water use, such as employee dining rooms and kitchens. With respect to the operation of uses proposed for the Project, an estimated total of 208,704 to 266,304 gallons per day (gpd) of potable water would be consumed during the day in which the proposed Project is fully occupied at buildout. Conservatively, assuming the average daily demand for water is extended over 365 days per year, the projected annual consumption for the entire project at buildout would be a maximum of 97.20 million gallons annually. This represents an increase of 0.04 percent over the annual volume of water supplied by the LADWP in fiscal year 2004.

[7] *The LADWP Board of Commissioners approved the Water Supply Assessment on March 22, 2005.*

The Project falls within Senate Bill 610 size criteria in which a water supply assessment (WSA) must be evaluated and approved by the LADWP (i.e., commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space). LADWP has concluded via the Project's WSA that adequate water supplies exist to serve the maximum proposed development.

Therefore, the water demand of the proposed Project would be less than significant in relation to the UWMP and with state water statutes.

Water Infrastructure

The water conveyance system serving the seven Development Sites includes water lines in Eastlake Avenue, San Pablo Street, Alcazar Street, Biggy Street and Zonal Avenue. An analysis was completed with regard to the ability of each of these lines to convey water to the site. As the analysis concludes that these water lines have sufficient capacity to convey the Project's maximum, Project impacts on the area's water conveyance system are less than significant.

Fire Flow

The water conveyance system at the Project site would also be required to meet LAFD fire flow standards. The LAFD Fire Marshall's office requires that water lines serving the Project site provide 6,000 to 9,000 gallons per minute (GPM) during simultaneous flow from four adjacent fire hydrants. In addition, in order to meet fire flow requirements, the residual pressure during the continuous flow from four hydrants, must not drop below 20 psi. Since the existing water pressure at the Project Site is adequate to meet this LAFD fire flow requirement, the existing conveyance system is adequate and the impact of the Project relative to fire flow would be less than significant.

In summary, the Project's total estimated water demand at buildout would not exceed available supplies or distribution infrastructure capabilities, the Project would not create a significant impact relative to the existing conveyance system, and fire flow would be adequate to meet LAFD requirements. Therefore, the Project would generate a less than significant impact in relation to water supply and water conveyance systems.

(2) Cumulative Impacts

The projected potable water consumption for the proposed Project in conjunction with that of related projects (identified in Section III.b of the Draft EIR) would increase daily demand on water supplies. However, since related projects are anticipated to be constructed in accordance with State and water conservation regulations and within the build-out scenario of

the controlling Community Plans and City of Los Angeles General Plan Elements, no significant impacts due to cumulative water demand are anticipated. The Project's off-site improvements would not create additional population or induce population growth directly or indirectly and, therefore, would not result in any secondary impacts on water consumption. As such, cumulative impacts associated with off-site improvements would be less than significant.

Via the UWMP plan process as well as compliance with the provisions of Senate Bill 610, and Assembly Bill 221, it is anticipated that LADWP would be able to supply the demands of the Project and related projects through the foreseeable future and no significant cumulative impacts related to water demand are anticipated.

(3) Mitigation Measures

Although development of the proposed Project is not anticipated to produce significant impacts to water supply services, the following measures would ensure that water resources would be conserved to the extent feasible:

Mitigation Measure F-1.1: Water faucet fixtures with activators shall be installed that automatically shut off the flow of water when not in use.

Mitigation Measure F-1.2: Automatic sprinkler systems shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

(4) Level of Significance after Mitigation

The total estimated water demand for the Project at buildout is not anticipated to exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure), or exceed the projected employment, housing, or population growth projections of the applicable General Plan Framework and Community Plan, as assumed in the planning for future water infrastructure needs. Therefore, no significant unavoidable adverse impacts relative to water consumption are anticipated to occur.

b. Wastewater

(1) Environmental Impacts

During construction of the Proposed Project, a negligible amount of wastewater would be generated by construction personnel. It is anticipated that portable toilets would be provided by

a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a time when a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any treatment plant by generating flows greater than those anticipated in the City Wastewater Facilities Plan. As such, construction impacts to the local wastewater conveyance and treatment system would be less than significant and no mitigation is required.

Implementation of the proposed Project would only require the construction of lateral lines from the Development Sites to the sewer lines in the public right-of-way. Those portions of the laterals constructed within the public right-of-way would have impacts relative to minor traffic lane disruption during trenching, laying of pipe, backfilling, and street resurfacing, since laterals would only be required from the property line of the Development Sites to the existing lines located in the street right-of-way. Standard practices and procedures, including traffic control, would be implemented to reduce the impact to the community to less than significant levels.

The regional wastewater treatment facility at the Hyperion Treatment Plant (HTP) has been improved to provide capacity for the incremental increase in sewage generated by anticipated growth in the City of Los Angeles. Regional wastewater facilities are at least partially funded through the collection of fees. The Sewerage Facilities Charge is collected by the City of Los Angeles from owners/developers of new land uses within the City. The Project would generate an incremental increase in the sewage flow treated by HTP. The Applicant would be subject to the payment of a Sewerage Facilities Charge for the development at the Health Sciences Campus. Fees may be offset by credits should credits be available through prior uses. All projects served by the Hyperion Treatment System are subject to the Sewer Allocation program, which limits additional discharge according to a pre-established percentage rate. If the allotment for a particular time period (usually a month) has already been allocated, the project is placed on a waiting list until adequate treatment capacity has been determined. Under the allocation program, HTP has capacity to serve a particular rate of growth. Since the Project is located in an area designated for commercial and public facility uses, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of the HTP by generating flows greater than those anticipated in the Wastewater Facilities Plan or City General Plan. Anticipated sewage flow for the Project at buildout would range from 163,050 to 208,050 gallons per day. As previously described, the Project would not be permitted prior to the availability of treatment capacity. Therefore, no significant impacts in relation to treatment capacity would occur.

The sewer conveyance system serving the seven proposed Development Sites includes sewer lines in Eastlake Avenue, San Pablo Street, Alcazar Street, Biggy Street, and Zonal

Avenue. Since all sewer lines serving the seven proposed Development Sites have adequate capacity to serve the maximum projected flow from each of the Development Sites, Project impacts relative to sewer line capacity is concluded to be less than significant.

(2) Cumulative Impacts

The Project and the related projects, which are not served by the local lines serving the Project Site, are not anticipated to cause a measurable increase in wastewater flows concurrent in time or at a point when a sewer line serving the Project Site capacity would be already constrained or that would cause a sewer's capacity to become constrained during peak service. In relation to broad growth and demand, all related projects would be subject to the City's Sewer Allocation program for the Hyperion Treatment Plant. This program limits additional discharge according to a pre-established percentage rate. Under the current allocation program, HTP has capacity to serve a particular rate of growth and prevent the occurrence of significant cumulative impacts relative to treatment capacity. Therefore, cumulative impacts to the local and regional sewer conveyance and treatment system, from the implementation of the proposed Project and related projects would be less than significant.

(3) Mitigation Measures

Although development of the proposed Project is not anticipated to result in significant impacts to sanitary sewers, the following measures would ensure that the increase in sewage generation would result in a less than significant impact.

Mitigation Measure F-2.1: Prior to the issuance of any building permits, the Development Services Division of the Bureau of Engineering, Department of Public Works, shall make a determination of capacity in the sewer pipeline between each proposed Development Site and the trunk sewer. If service is discovered to be less than adequate, the Applicant shall be required to upgrade the connections to the mains and/or provide an alternative solution, in order to appropriately serve the Project.

Mitigation Measure F-2.2: The Applicant shall comply with procedural requirements of City ordinances regulating connections to the City sewer system (e.g., Ordinance No. 166,060).

Mitigation Measure F-2.3: All necessary on-site infrastructure improvements shall be constructed to meet the requirements of the Department of Building and Safety.

Mitigation Measure F-2.4: The Applicant shall apply for and comply with all necessary permits, including Industrial Wastewater Discharge Permits, if required.

(4) Unavoidable Adverse Impacts

With the implementation of the recommended mitigation measures, any local deficiencies in sewer lines would be identified and remedied and wastewater generation rates would be reduced. No significant impacts on wastewater conveyances or the capacity of the Hyperion wastewater treatment facility would occur.

c. Solid Waste

(1) Environmental Impacts

The City of Los Angeles currently does not own or operate any landfill facilities. The disposal of solid waste generated within the City of Los Angeles, as well as throughout all of Los Angeles County, is a shared responsibility of the County of Los Angeles, the cities within Los Angeles County, County Sanitation Districts, private industry, and other stakeholders. A total of approximately 23.8 million tons of solid waste was generated throughout Los Angeles County in 2003 (the most current year for which data is available). This total is forecasted to increase to 27.5 million tons in 2015. Currently, there is a shortage of in-County landfill disposal capacity as over 7,000 tons per day of solid waste is being exported out of Los Angeles County. As such, municipal solid waste generated in Los Angeles County is disposed of at landfills that are located within, as well as outside, Los Angeles County. In 2003, approximately 20 percent of the solid waste generated in Los Angeles County was disposed of at landfill facilities located outside of Los Angeles County. The County's Department of Public Works forecasts that the proportion of Los Angeles County generated solid waste that is disposed of at landfills located outside of Los Angeles County is going to increase in the future given the difficulties with permitting new or expanded landfill facilities within the County itself.

The County of Los Angeles, Department of Public Works, in February 2005, issued the 2003 Annual Report to the Los Angeles County Integrated Waste Management Plan. This Plan, inclusive of its annual reports, serves as the primary planning document for the County's waste disposal needs, which includes solid waste generated throughout the City of Los Angeles. The 2003 Annual Report (the most recent available report), clearly concludes that there is enough capacity within permitted solid waste facilities (i.e., landfills) to serve Los Angeles County through the 15-year planning period of 2003–2018. The 2003 Annual Report specifically states that "the County of Los Angeles will protect the health and safety of all residents in the County by ensuring that solid waste disposal service, an essential public service, is provided without interruption through the 15-year planning period and in the long term." With regard to inert

landfills, the County's 2003 Annual Report, indicates that based on current disposal rates, capacity within existing inert landfills would be available for approximately 60 years (i.e., around 2065). Based on this data, it is concluded that there is no anticipated shortfall in disposal capacity for inert waste within the County.

Project development would generate solid waste during Project construction as well as on an ongoing basis once the new facilities are occupied. Solid waste generated during Project construction would be disposed of at landfills accepting inert materials and municipal solid waste, whereas solid waste generated during Project operations would be disposed of at landfills accepting municipal waste. Project operations, in addition to generating typical types of municipal solid waste, would also generate medical wastes based on the types of uses anticipated to be developed at the Project site. All medical wastes generated on the Project site would be properly transported for treatment off-site at privately-owned treatment facilities. Following processing at a licensed treatment facility, the medical wastes are sterile and classified as municipal solid waste and disposed of in landfills accepting municipal solid waste.

Total solid waste generated by all Project construction activity is conservatively forecasted to total approximately 28,426 tons. Based on this forecast, Project generated construction-related waste (i.e., asphalt and construction debris) would represent a small percentage (0.04 percent) of the inert waste disposal capacity in the region. This level of impact constitutes a less than significant impact, as the proposed Project would not create a need for additional solid waste disposal facilities to adequately handle Project-generated inert waste. Furthermore, this estimate is very conservative as it assumes no construction debris would be recycled. Therefore, impacts relative to construction waste would likely be far less than the levels identified in this analysis based on the Applicant's construction practices with buildings such as those that would be constructed under the proposed Project.

During Project operations, a total of approximately 1.7 and 423.7 tons of solid waste would be generated on a daily and annual basis, respectively, based on the maximum amount of development that could occur under the proposed Project.[8] Of these totals, approximately six percent (6 percent) of the solid waste generated would be medical waste that would be treated to acceptable standards prior to landfill disposal.

The Applicant currently operates a comprehensive program of recycling municipal solid waste generated at all of its facilities. This program consists of the following three components:

[8] *Based on a maximum of 765,000 square feet of development and an average solid waste generation rate of 4.08 pounds per 1,000 square feet of development per day. This rate is based on a conservative estimate that the total annual waste totals are generated on a five day per week operational schedule (or 260 days of operation per year), when in practice a portion of USC facilities generate waste six and seven days per week. This is conservative because by assuming a shorter operational schedule, the solid waste generation rate increases.*

(1) recycling, (2) waste to energy, and (3) material recovery. The University's municipal waste recycling program is a source sorted recycling program that handles the following commodities: newspaper, aluminum, dirt and rock, green waste, glass and plastic, metal, and cardboard, as well as white and mixed paper. With regard to waste to energy, the University sends a minimum of 25 percent of its waste stream to a waste to energy conversion plant located in the City of Commerce. The third component of the University's recycling program is to send the remaining waste to a Material Recovery Facility where all recyclables are sorted out and delivered to recycling companies. The University is also committed to an ever-expanding recycling program in response to market opportunities. On an annual basis, the University has met or exceeded the waste diversion goals set forth in AB 939 since the legislation was enacted (i.e., the diversion of 50 percent of the University's waste stream from landfill disposal). The Applicant has indicated that they would extend their existing recycling program to include the proposed Project.

The Project's contribution to the Countywide waste stream would constitute a very small fraction of the amount of solid waste generated in Los Angeles County on an annual basis. Specifically, the solid waste generated by the proposed Project at buildout, based on the maximum amount of proposed development (i.e., 765,000 square feet), would constitute 0.0018 percent of the 23.8 million tons of solid waste generated in Los Angeles County in 2003 and 0.0015 percent of the 27.5 million tons of solid waste forecasted to be generated in Los Angeles County in 2015 (i.e., the year of Project buildout). Based on a diversion rate of 50 percent for municipal solid waste and 7 percent for medical wastes, the actual amount of solid waste disposed of at a landfill would be slightly more than half of that identified above. It is anticipated that landfill disposal capacity would be available to accommodate the solid waste generated by the proposed Project. Although there is presently no guarantee that new or expanded disposal facilities will be opened by 2015, solid waste generated by the operation of the proposed Project would not materially alter the projected timeline for these landfills to reach capacity. Impacts to municipal solid waste disposal facilities would, however, be considered potentially significant. Mitigation measures are proposed below to require implementation of the Project Design Features, which serve to reduce these potentially significant impacts to a less than significant level.

The applicable sections of the City of Los Angeles' Source Reduction and Recycling Element, the City's Solid Waste Management Policy Plan, General Plan Framework Element and the Curbside Recycling Program that apply to private development projects all focus on the incorporation of recycling efforts into the design and operation of a proposed project. As the proposed Project implements the policy directives of these plans via the implementation of the Project Design Features that are expressly targeted towards solid waste recycling during Project construction in addition to a comprehensive recycling program that would be implemented during Project operations, the Project is consistent with the applicable referenced plans and policies, and a less than significant impact would result.

The existing HSC campus is served by a network of solid waste collection routes. As the Project proposes development within the existing HSC campus, Project development would not require the need for additional solid waste collection route(s). Thus, Project development would result in a less than significant impact with regard to this aspect of solid waste disposal.

A total of 30 major transfer stations and materials recovery facilities (i.e., facilities with a daily capacity of 100 or more tons per day) currently operate in Los Angeles County. These facilities currently handle less than 50 percent of their permitted capacities. Thus, a less than significant impact would result as implementation of the Project as proposed would not result in the need for additional recycling facilities.

(2) Cumulative Impacts

Development of the identified related projects would generate solid waste during their respective construction periods as well as on an on-going basis following the completion of construction. Cumulative construction solid waste generated by the identified related projects, as well as the proposed Project, constitutes approximately 0.55 percent of the remaining inert landfill capacity. Based on this small percentage, cumulative impacts on inert landfill capacity are concluded to be less than significant.

During operations, cumulative solid waste generation is forecasted to be 47.4 and approximately 14,256 tons on a daily and annual basis, respectively. Cumulative annual solid waste generation represents 0.06 percent of the total solid waste generated in Los Angeles County in 2003. Using an average diversion rate of 50 percent, the percentage that cumulative development constitutes of annual solid waste disposal in Los Angeles County would be cut in half. Based on these small percentages, cumulative impacts on municipal landfill capacity are concluded to be less than significant.

As future development would be coordinated with applicable public and private waste haulers with regard to solid waste collection services, cumulative impacts with regard to solid waste collection routes would be less than significant.

It is anticipated that the proposed Project and other related projects would not conflict with the solid waste policies and objectives intended to help achieve the requirements of AB 939 and as a result, cumulative impacts would be less than significant.

(3) Mitigation Measures

Mitigation Measure F.3-1: The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed Project.

Mitigation Measure F.3-2: The Applicant shall implement a demolition and construction debris recycling plan for all buildings constructed as part of the proposed Project, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Mitigation Measure F.3-3: All structures constructed or uses established within any part of the proposed Project Site shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials.

Mitigation Measure F.3-4: Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.

Mitigation Measure F.3-5: The Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of concessionaires, patrons, and employees clearly marked, durable and separate recycling bins on the same lot, or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

(4) Level of Significance After Mitigation

The proposed Project, inclusive of the mitigation measures identified above, would result in a less than significant impact with regard to landfill disposal capacity during Project construction and on-going Project operations. Potential Project impacts relative to adopted solid waste diversion programs and policies as well as the need for additional solid waste collection routes would be less than significant. Cumulative impacts with regard to landfill disposal capacity; consistency with adopted City solid waste plans, policies and programs; and solid waste collection routes are all concluded to be less than significant.

II. Mitigation Monitoring and Reporting Program

II. MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines, which require adoption of a Mitigation Monitoring and Reporting Program for all projects for which an Environmental Impact Report or Mitigated Negative Declaration has been prepared. Specifically, Section 21081.6 of the Public Resources Code states: "…the [lead] agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment… [and that program]… shall be designed to ensure compliance during project implementation." The City of Los Angeles, Department of City Planning is the Lead Agency for the proposed Project.

The MMRP describes the procedures for the implementation of all of the mitigation measures identified in the EIR for the proposed Project. It is the intent of the MMRP to: (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes where feasible.

The MMRP lists mitigation measures according to the same numbering system contained in the Draft EIR and Revised Draft EIR sections. Each mitigation measure is categorized by topic, with an accompanying discussion of the following:

- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure);
- The monitoring agency (i.e., the agency to which mitigation reports involving feasibility, compliance, implementation, and development operation are made).
- The phase of the Project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The monitoring frequency and duration of monitoring and reporting (i.e., once at Site Plan Review/Plan Approval or monthly during construction); and

- The administrative procedures for the clearance of mitigation measures (i.e., Approval of Site Plan or Monthly Statements of Compliance).

The Applicant shall be obligated to demonstrate that compliance with the required mitigation measures has been effected. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Applicant unless otherwise noted.

B. MITIGATION MONITORING AND REPORTING PROGRAM

1. Land Use

No land use mitigation measures are identified in the EIR.

2. Visual Resources

Mitigation Measure B-1: The Applicant shall ensure, through appropriate postings and daily visual inspections, that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that any such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Monthly during construction

Action Indicating Compliance with Mitigation Measure(s): Monthly Statements of Compliance

Mitigation Measure B-2: Building façades facing public streets shall be designed to enhance the pedestrian experience and connectivity of the HSC campus through such features as wide and well-illuminated entry areas, landscaping, and informal gathering space.

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-3: Architectural design and exterior building materials shall be compatible with the theme and quality of building design and materials used within the HSC campus.

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-4: New utilities shall be constructed underground, to the extent feasible.

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-5: Exterior signage for the proposed buildings shall be compatible with the design of the building.

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-6: All new or replacement street trees shall be selected for consistency with the existing street trees or in accordance with a street tree master plan reviewed and approved by the Department of Public Works Street Tree Division.

Enforcement Agency: Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

Monitoring Agency: Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at issuance of Building permit; once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Issuance of Building permits; approval of site plans

Mitigation Measure B-7: All mechanical, electrical and rooftop equipment shall be screened from view from adjacent surface streets.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-8: Landscaping and/or vegetation features shall be incorporated into the design of each Development Site.

Enforcement Agency: City of Los Angeles, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

Monitoring Agency: City of Los Angeles, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

Mitigation Measure B-9: All exterior lighting shall be directed on-site or shielded to limit light spillover effects.

Enforcement Agency: City of Los Angeles, Department of City Planning

Monitoring Agency: City of Los Angeles, Department of City Planning

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Approval of site plans

3. Traffic Circulation and Parking

Please refer to Attachment A of this Mitigation Monitoring and Reporting Program for detailed information regarding the sequencing of the Project's traffic mitigation measures.

a. Parking Scenario No. 1 Mitigation

Mitigation Measure C-1: Intersection No. 2: I-5 Freeway Southbound and Mission Road—Widen the southbound off-ramp to provide an additional lane. The off-ramp would provide one left-turn only lane, one combination left-turn/through lane and one right-turn only lane. Modify the existing traffic signal to facilitate traffic flow.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-2: Intersection No. 3: I-5 Freeway Northbound Off-Ramp and Daly Street–Main Street—Install a traffic signal at this location to facilitate traffic flow during the A.M. peak commuter hour.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-3: Intersection No. 6: I-5 Freeway Northbound On-Ramp and Marengo Street—Lengthen the red curb along the south side of Marengo Street, west of the on-ramp, and install an eastbound right-turn-only lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-4: Intersection No. 10: Biggy Street and Zonal Avenue—Restripe the southbound approach to provide one left turn/through lane and one right-turn-only lane. Re-stripe the eastbound approach to provide one left-turn lane and one optional through/right-turn-only lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-5: Intersection No. 12: San Pablo Street and Alcazar Street—Install a traffic signal at this location.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-6: Intersection No. 14: San Pablo Street and Zonal Avenue—Install a traffic signal at this location.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-7: Intersection No. 16: Soto Street and I-10 Freeway Westbound Ramps–Charlotte Street—Implement the LADOT-approved mitigation measure associated with the HNRT project, including widening of the I-10 Freeway Westbound Off-ramp to provide an additional right-turn only lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-8: Intersection No. 17: Soto Street and Marengo Street—Remove the raised median islands on Soto Street, north and south of Marengo Street. Re-stripe the northbound and southbound approaches to provide dual left-turn lanes, two through lanes and one combination through/right-turn lane. Provide traffic signal modification at this intersection. This measure has only received conceptual approval at this time.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-9: Intersection No. 18: Soto Street and I-10 Freeway Eastbound Off-Ramp–Wabash Avenue—Restripe Soto Street, south of Wabash Avenue, within the existing roadway pavement width, to provide an additional northbound through lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

b. Parking Scenario No. 2 Mitigation

Mitigation Measure C-10: Intersection No. 2: I-5 Freeway SB and Mission Road—Widen the southbound off-ramp to provide an additional lane. The off-ramp would provide one left-turn only lane, one combination left-turn/through lane and one right-turn only lane. Modify the existing traffic signal to facilitate traffic flow.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-11: No. 3: I-5 Freeway NB Off-Ramp and Daly Street–Main Street—Install a traffic signal at this location.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-12: Intersection No. 6: I-5 Freeway NB On-Ramp and Marengo Street—Lengthen the red curb along the south side of Marengo Street, west of the on-ramp, and install an eastbound right-turn-only lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s)

constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-13: Intersection No. 12: San Pablo Street and Alcazar Street—Install a traffic signal at this location.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-14: Intersection No. 14: San Pablo Street and Zonal Avenue—Install a traffic signal at this location.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-15: Intersection No. 15: Soto Street and Alcazar Street—Install a second northbound left-turn lane and widen along the south side of Alcazar

Street, west of Soto Street, to provide a fourth eastbound approach lane (i.e., the eastbound approach would provide one left-turn lane, one combination left-through lane and two right-turn only lanes). Modify the traffic signal.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-16: Intersection No. 16: Soto Street and I-10 Freeway WB Ramps–Charlotte Street—Implement the LADOT-approved mitigation measure associated with the HNRT project, including widening of the I-10 Freeway Westbound Off-ramp to provide an additional right-turn only lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-17: Intersection No. 17: Soto Street and Marengo Street—Remove the raised median islands on Soto Street, north and south of Marengo Street. Re-stripe the northbound and southbound approaches to provide dual left-turn lanes, two through lanes and one combination through/right-turn

lane. Provide traffic signal modification at this intersection. This measure has only received conceptual approval at this time.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

Mitigation Measure C-18: Intersection No. 18: Soto Street and I-10 Freeway EB Off-Ramp–Wabash Avenue—Re-stripe Soto Street, south of Wabash Avenue, within the existing roadway pavement width to provide an additional northbound through lane.

Enforcement Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Agency: City of Los Angeles, Department of Transportation, Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at Site Plan Review or Plan Approval

Action Indicating Compliance with Mitigation Measure(s): Improvement(s) guaranteed prior to the issuance of the building permit for the particular building that triggers the improvement(s). Improvement(s) constructed prior to the issuance of the certificate of occupancy for the particular building that triggers the improvement(s).

c. Construction Traffic (Parking Scenarios Nos. 1 and 2)

Mitigation Measure C-19: The Applicant shall prepare and implement a truck/traffic construction management plan.

Enforcement Agency: City of Los Angeles, Department of Transportation (LADOT)

Monitoring Agency: City of Los Angeles, Department of Transportation (LADOT)

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

4. Air Quality

a. Construction

Mitigation Measure D-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.[9]

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-2: Disturbed areas shall be watered three times daily, which is above and beyond the SCAQMD Rule 403 requirement to water disturbed areas two times daily.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

[9] *SCAQMD Rule 403 requirements are detailed in Appendix D of the Draft EIR.*

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-3: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-4: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would turn their engines off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-6: All construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-7: Project heavy-duty construction equipment shall use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure D-8: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

b. Operations

Mitigation Measure D-9: The Applicant shall provide public education to USC Health Science Campus visitors and employees regarding the importance of reducing vehicle miles traveled and utilizing transit, and the related air quality benefits through the use of brochures and other informational tools.

Enforcement Agency: City of Los Angeles

Monitoring Agency: City of Los Angeles

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

Mitigation Measure D-10: The Applicant shall, to the extent feasible, schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

Enforcement Agency: City of Los Angeles

Monitoring Agency: City of Los Angeles

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

Mitigation Measure D-11: The Applicant shall coordinate with the MTA and the City of Los Angeles Department of Transportation to provide information with regard to local bus and rail services.

Enforcement Agency: City of Los Angeles

Monitoring Agency: City of Los Angeles

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

5. Noise

a. Construction Noise

Mitigation Measure E-1: Prior to the issuance of any grading, excavation, haul route, foundation, or building permits, the Applicant shall provide proof satisfactory to the Department of Building and Safety and Planning Department that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday, and that a noise management plan for compliance and verification has been prepared by a monitor retained by the Applicant. At a minimum, the plan shall include the following requirements:

1. Pile drivers used in proximity to sensitive receptors shall be equipped with noise control having a minimum quieting factor of 10 dB(A);

2. Loading and staging areas must be located on site and away from the most noise-sensitive uses surrounding the site as determined by the Department of Building and Safety;

3. Program to maintain all sound-reducing devices and restrictions throughout the construction phases;

4. An approved haul route authorization that avoids noise-sensitive land uses to the maximum extent feasible; and

5. Identification of the noise statutes compliance/verification monitor, including his/her qualifications and telephone number(s).

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading, excavation, haul route, foundation, or building permits

b. Operations Noise

Mitigation Measure E-2: If a loading dock/refuse collection area is proposed to be located on Development Site D, the Applicant shall be required to submit evidence, prior to the issuance of building permits for Development Site D, that is satisfactory to the City of Los Angeles Department of Building and Safety that noise level increases do not cause the baseline ambient noise level to increase beyond the 5-dBA significance threshold at any adjacent property line. This mitigation measure does not apply to development that may occur on Development Sites A, B, C, E, F, and G.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits

6. Water Supply and Wastewater

a. Water Supply

Mitigation Measure F-1.1: Water faucet fixtures with activators shall be installed that automatically shut off the flow of water when not in use.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits

Mitigation Measure F.1-2: Automatic sprinkler systems shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler

months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

b. Wastewater

Mitigation Measure F-2.1: Prior to the issuance of any building permits, the Development Services Division of the Bureau of Engineering, Department of Public Works, shall make a determination of capacity in the sewer pipeline between each proposed Development Site and the trunk sewer. If service is discovered to be less than adequate, the Applicant shall be required to upgrade the connections to the lines and/or provide an alternative solution, in order to appropriately serve the Project.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits

Mitigation Measure F-2.2: The Applicant shall comply with the procedural requirements of City ordinances regulating connections to the City sewer system (e.g., Ordinance No. 166,060).

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure F-2.3: All necessary on-site infrastructure improvements shall be constructed to meet the requirements of the Department of Building and Safety.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

Mitigation Measure F-2.4: The Applicant shall apply for and comply with all necessary permits, including Industrial Wastewater Discharge Permits, if required.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading or building permits

c. Solid Waste

Mitigation Measure F.3-1: The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed Project.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

Mitigation Measure F.3-2: The Applicant shall implement a demolition and construction debris recycling plan for all buildings constructed as part of the proposed Project, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Enforcement Agency: Department of Public Works, Bureau of Sanitation

Monitoring Agency: Department of Public Works, Bureau of Sanitation

Monitoring Phase: -Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits

Mitigation Measure F.3-3: All structures constructed or uses established within any part of the proposed Project Site shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials.

Enforcement Agency: City of Los Angeles, Department of Building and Safety

Monitoring Agency: City of Los Angeles, Department of Building and Safety

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

Mitigation Measure F.3-4: Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.

Enforcement Agency: Department of Public Works, Bureau of Sanitation

Monitoring Agency: Department of Public Works, Bureau of Sanitation

Monitoring Phase: Operations

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

Mitigation Measure F.3-5: The Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of concessionaires, patrons, and employees clearly marked, durable and separate recycling bins on the same lot, or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

Enforcement Agency: Department of Public Works, Bureau of Sanitation

Monitoring Agency: Department of Public Works, Bureau of Sanitation

Monitoring Phase: Operation

Monitoring Frequency: Ongoing during operations

Action Indicating Compliance with Mitigation Measure(s): Annual statement of compliance

ATTACHMENT A
TRAFFIC MITIGATION SEQUENCING PLAN

Appendix Table F1
INTERSECTION MITIGATION SENSITIVITY ANALYSIS
ASSUMES PARKING SCENARIO NO 1: ALL PARKING PROVIDED AT DEV. SITE C (LOT 71)
USC Health Sciences Campus Project

05-May-2005

NO.	INTERSECTION	MITIGATION MEASURE	RESEARCH & DEV. EQUIVALENT SQUARE FEET
16	Soto Street/ I-10 Freeway WB Ramps-Charlotte Street	Partial mitigation for this intersection consists of the previously City reviewed and approved mitigation measure associated with the USC HNRT project. The previously reviewed and approved mitigation measure involves the widening of the I-10 Freeway WB off-ramp to provide an additional right-turn only lane. The PEER document is currently in preparation and will be submitted to Caltrans for review.	62,000 SF [1]
2	I-5 Freeway SB Ramps/ Mission Road	Mitigation for this intersection consists of widening the SB off-ramp to provide an additional lane. The off-ramp would provide one left-turn only lane, one combination left-turn/through lane and one right-turn only lane. A traffic signal modification would also be required.	118,000 SF
17	Soto Street/ Marengo Street	Mitigation for this intersection consists of the removal of the raised median islands on Soto Street, north and south of Marengo Street, restriping the NB and SB approaches to provide dual left-turn lanes, two through lanes, and one combination through/right-turn lane, as well as a traffic signal modification.	126,000 SF
6	I-5 Freeway NB On-Ramp/ Marengo Street	Mitigation for this intersection consists of the installation of an EB right-turn only lane. This measure will involve a lengthening of the red curb along the south side of Marengo Street west of the on-ramp.	187,000 SF
5	Mission Road/ Daly Street-Marengo Street	Due to limited right-of-way, no mitigation measures are recommended at this time.	250,000 SF
7	Mission Road/ Griffin Avenue-Zonal Avenue	Due to limited right-of-way, no mitigation measures are recommended at this time.	361,000 SF
3	I-5 Freeway NB Off-Ramp/ Daly Street-Main Street	Mitigation for this intersection consists of the installation of a traffic signal.	372,000 SF
14	San Pablo Street/ Zonal Avenue	Mitigation for this intersection consists of the installation of a traffic signal.	445,000 SF
10	Biggy Street/ Zonal Avenue	Mitigation for this intersection consists of restriping the SB approach to provide one combination left-turn/through lane and one right-turn only lane, and restriping the WB approach to provide one combination left-turn/through lane and one right-turn only lane.	465,000 SF
12	San Pablo Street/ Alcazar Street	Mitigation for this intersection consists of the installation of a traffic signal.	488,000 SF
18	Soto Street/ I-10 Freeway EB Off-Ramp-Wabash Avenue	Mitigation consists of restriping Soto Avenue, south of Wabash Avenue to provide an additional through lane.	680,000 SF

[1] Although 62,000 square feet of R&D square footage triggers a significant impact, no additional feasible mitigation measures have been identified.

Appendix Table F2
INTERSECTION MITIGATION SENSITIVITY ANALYSIS
ASSUMES PARKING SCENARIO NO 2: ALL PARKING PROVIDED AT DEV. SITES E AND F
USC Health Sciences Campus Project

05-May-2005

NO.	INTERSECTION	MITIGATION MEASURE	RESEARCH & DEV. EQUIVALENT SQUARE FEET
16	Soto Street/ I-10 Freeway WB Ramps-Charlotte Street	Partial mitigation for this intersection consists of the previously City reviewed and approved mitigation measure associated with the USC HNRT project. The previously reviewed and approved mitigation measure involves the widening of the I-10 Freeway WB off-ramp to provide an additional right-turn only lane. The PEER document is currently in preparation and will be submitted to Caltrans for review.	61,000 SF [1]
15	Soto Street/ Alcazar Street	Mitigation for this intersection includes the installation of a second NB left-turn lane and widening along the south side of Alcazar Street, west of Soto Street, to provide a fourth EB approach lane (i.e., EB approach would provide one left-turn lane, one combination left-through lane and two right-turn only lanes). A traffic signal modification at this location would also be required.	79,000 SF
17	Soto Street/ Marengo Street	Mitigation for this intersection consists of the removal of the raised median islands on Soto Street, north and south of Marengo Street, restriping the NB and SB approaches to provide dual left-turn lanes, two through lanes, and one combination through/right-turn lane, as well as a traffic signal modification.	90,000 SF
2	I-5 Freeway SB Ramps/ Mission Road	Mitigation for this intersection consists of widening the SB off-ramp to provide an additional lane. The off-ramp would provide one left-turn only lane, one combination left-turn/through lane and one right-turn only lane. A traffic signal modification would also be required.	118,000 SF
12	San Pablo Street/ Alcazar Street	Mitigation for this intersection consists of the installation of a traffic signal.	229,000 SF
5	Mission Road/ Daly Street-Marengo Street	Due to limited right-of-way, no mitigation measures are recommended at this time.	250,000 SF
6	I-5 Freeway NB On-Ramp/ Marengo Street	Mitigation for this intersection consists of the installation of an EB right-turn only lane. This measure will involve a lengthening of the red curb along the south side of Marengo Street west of the on-ramp.	296,000 SF
18	Soto Street/ I-10 Freeway EB Off-Ramp-Wabash Avenue	Mitigation consists of restriping Soto Avenue, south of Wabash Avenue to provide an additional through lane.	310,000 SF
14	San Pablo Street/ Zonal Avenue	Mitigation for this intersection consists of the installation of a traffic signal.	426,000 SF
3	I-5 Freeway NB Off-Ramp/ Daly Street-Main Street	Mitigation for this intersection consists of the installation of a traffic signal.	530,000 SF
8	Mission Road/ Valley Boulevard	Due to limited right-of-way and the sensitivity of any on-street parking removals, no mitigation measures are recommended at this time.	741,000 SF

[1] Although 61,000 square feet of R&D square footage triggers a significant impact, no additional feasible mitigation measures have been identified.

III. Corrections and Additions to the Draft EIR

III. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

INTRODUCTION

Corrections and Additions to the Draft EIR are a function of the public comments received on the Draft EIR during the public review period of May 25, 2005 through July 11, 2005, and the Revised Draft EIR public review period of August 18, 2005 through October 3, 2005. Where public comments resulted in additional study or modification of information contained in the Draft or Revised EIRs, this information is presented as a Correction and Addition to the Draft or Revised EIRs. The Corrections and Additions section provides a means by which all the corrections and changes in the Draft or Revised EIRs are presented in one place. The Corrections and Additions that have been identified are limited to a text change in the Land Use and Planning section of the Draft EIR, and the addition of Section IV.F.3 Solid Waste. None of the Corrections and Additions results in conclusions of significance, not previously identified in the Draft and Revised EIRs.

I. EXECUTIVE SUMMARY

I-1 Section I.G.6.c, Solid Waste, has been added to provide a summary of the Project's potential solid waste impacts.

II. PROJECT DESCRIPTION

There are no corrections or additions to this section of the Draft EIR.

III.A. OVERVIEW OF ENVIRONMENTAL SETTING

There are no corrections or additions to this section of the Draft EIR.

III.B. IDENTIFICATION OF RELATED PROJECTS

There are no corrections or additions to this section of the Draft EIR.

IV.A. LAND USE AND PLANNING

IV.A-1 Section IV.A.3., Adelante Eastside Redevelopment Plan, page 83: Omit the sentence "The original plan was adopted in 1979 and most recently amended in

1999" and replace with "The plan was adopted by the Los Angeles City Council via Ordinance No. 172514 on March 30, 1999, and to date has not been amended."

IV.B. VISUAL RESOURCES

There are no corrections or additions to this section of the Draft EIR.

IV.C. TRAFFIC, CIRCULATION AND PARKING

IV.C-1 Section IV.C.5. Mitigation Measures: Add the following mitigation measure:

Mitigation Measure C-19: The Applicant shall prepare and implement a truck/traffic construction management plan.

IV.D. AIR QUALITY

There are no corrections or additions to this section of the Draft EIR.

IV.E. NOISE

There are no corrections or additions to this section of the Draft EIR.

IV.F. UTILITIES

IV.F-1 Add Section IV.F.3. Solid Waste, which consists of the following text:

IV.F.3 SOLID WASTE

1. Introduction

This section addresses potential impacts of the proposed Project on solid waste facilities, service systems, and regulations. This section describes the City and County solid waste collection services and disposal facilities that serve the Project Site, as well as the regulatory measures intended to minimize the volume of solid waste requiring landfill disposal, such as relevant State legislation and City/County recycling programs. This section also estimates the amount of solid waste generated daily by the proposed Project during construction and at buildout and evaluates the impacts of solid waste generation by the proposed Project on existing solid waste collection and disposal facilities that serve the City.

2. Environmental Setting

a. Regulatory Setting

The California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, identify programs local jurisdictions must implement to achieve specific solid waste disposal reduction goals and requires each development project to provide an adequate storage area for the collection and removal of recyclable materials.

The Los Angeles County Solid Waste Management Action Plan is a comprehensive solid waste management study and implements a regional approach to managing solid waste, incorporating source reduction, recycling, and composting programs along with public education awareness programs. The Action Plan recognizes that landfills will remain an integral part of the County's solid waste management system for the foreseeable future, providing for 15 years of disposal capacity on a countywide basis. The Action Plan reaffirms the policy of managing solid waste in Los Angeles County through a reasonable balance of public and private operations and facilities, including a regional public/private landfill system. This policy, combined with sufficient daily disposal capacity, relies on competitive market forces rather than government action to regulate waste flow.

The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) is the long-range solid waste management policy plan for the City, while the Source Reduction and Recycling Element (SRRE) is the strategic action policy plan for diverting solid waste from landfills. The objective of the CiSWMPP is to reduce at the source or recycle a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter. The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. The CiSWMPP establishes a citywide diversion objective of 70 percent by 2020. The CiSWMPP provides direction for the solid waste management and integrates all facets of solid waste management planning. It ensures that disposal practices do not conflict with diversion goals. It also serves as an umbrella document for the City's SRRE as well as other citywide solid waste management planning activities.

The following five goals of the CiSWMPP reflect the importance of source and materials recovery to the success of the plan and, therefore, the intent of the City to follow state regulations:

- Maximum Waste Diversion: The goal is to create an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes waste requiring disposal.

- Adequate Recycling Facility Development: To expand the siting of facilities that enhance waste reduction, recycling, and composting throughout the City beyond the current limits of the zoning code in ways that are economically, socially, and politically acceptable.

- Adequate Collection, Transfer, and Disposal of Mixed Solid Waste: The City shall ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed in a manner that minimizes adverse environmental impacts.

- To develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.

- The City shall operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.

The General Plan Framework Element (Element) is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide General Plan elements. The Element responds to State and Federal mandates to plan for the future. In planning for the future, the City of Los Angeles is using population forecasts provided by the Southern California Association of Governments (SCAG). The Element addresses many programs the City has implemented to divert waste from disposal facilities. These include source reduction programs such as home composting, recycling programs such as the Curbside Recycling Program, and composting programs. The Element suggests that for these programs to succeed, the City should site businesses at appropriate locations within its borders that handle, process, and/or manufacture recyclable commodities to allow a full circle recycling system to develop. It also discusses how Recycling Market Development Zones and other development zone areas should be utilized to bring these beneficial businesses into Los Angeles, and suggests that development and support of recyclable materials markets is one of the City's challenges in the years ahead. The Element addresses the means for dealing with the solid waste remaining after diversion, for which the City will have a continuing need for solid waste transfer and disposal facilities. It states that the capacity of the landfills located in Los Angeles is very limited, and that more transfer facilities will be needed to transfer waste from the collection vehicles and transport it to other, more remote landfill facilities. The Element acknowledges that capacity must be provided for the waste collected by both City agencies and private collection companies and identifies several landfill disposal facilities that may be accessed by truck. The Element also identifies other landfill disposal facilities that would require the City to ship its solid waste by train.

Solid waste recycling within the City of Los Angeles is also addressed via provisions set forth in various sections of the Los Angeles Municipal Code (LAMC) which were enacted via the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687, August 13, 1997). The Ordinance in addition to setting forth standards for the location and operating characteristics of recycling centers and processing facilities also sets forth the requirements for the inclusion of recycling areas within individual development projects.

Due to the nature of the proposed Project uses, medical waste, which is classified as hazardous waste, would be generated. Hazardous wastes are governed under federal laws, including the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, the Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA). A generator or handler of hazardous materials is required to adhere to the standards outlined in these acts, including environmental safety measures and reporting requirements. In California, medical waste generators and treatment facilities must operate in compliance with the Medical Waste Management Act (MWMA) (California Health and Safety Code, Sections 117600–118360). The MWMA requires generators to register and file a waste management plan with an enforcement agency. In Los Angeles County, the relevant agency is the California State Department of Health Services.

The MWMA requires that a waste generator's waste management plan include the types and average monthly quantity of medical waste generated, the name and address of the registered hazardous waste hauler used to transport the waste to a treatment facility, the name and address of the offsite treatment facility, and an emergency action plan in the event of a disruption of service (as a result of a natural disaster or equipment failure). The plan must also detail the containment and safe storage procedures for medical waste, in accordance with the MWMA, as well as the procedures in the event of a medical waste spill. Furthermore, the plan must identify the storage area on-site for the waste containers prior to their pick-up and transport off-site. Medical waste generators are responsible for the waste from the point of generation, through the treatment process and to its disposal in a landfill (in other words from 'cradle to grave').[10]

b. Existing Conditions

Two types of solid waste are currently generated at the USC HSC. The two types are municipal solid waste and medical waste. The recycling and management of municipal solid waste is discussed first, followed by an overview of the campus's hazardous waste management system.

[10] *Information obtained from the California Department of Health Services website at www.dhs.ca.gov/ps/ddwem/environmental/Med_Waste/default.htm.*

USC currently operates a comprehensive program of municipal solid waste recycling for all of its facilities. This program consists of the following three components: (1) recycling, (2) waste to energy, and (3) material recovery. The University's municipal waste recycling program is a source sorted recycling program that handles the following commodities: newspaper, aluminum, dirt and rock, green waste, glass and plastic, metal, and cardboard, as well as white and mixed paper. With regard to waste to energy, the University sends a minimum of 25 percent of its waste stream to a waste to energy conversion plant located in the City of Commerce. This facility generates enough energy to supply over 20,000 households. The metal which can not be incinerated is sorted out and recycled, and the incinerator ash is mixed with concrete to make roadbed. The third component of the University's recycling program is to send the remaining waste to a Material Recovery Facility where all recyclables are sorted out and delivered to recycling companies. The university is also committed to an ever-expanding recycling program in response to market opportunities. On an annual basis, the University has met or exceeded the waste diversion goals set forth in AB 939 since the legislation was enacted (i.e., the diversion of 50 percent of the University's waste stream from landfill disposal).

With respect to the Project Site, all of the proposed Development Sites, with the exception of Development Site F, are paved with asphalt in an urban and developed area of the City. Development Site F is partially covered with asphalt (i.e., approximately 50 percent) and the balance is covered with dirt. No structures would be demolished in order to develop the seven proposed Development Sites.[11] As such, demolition debris would consist primarily of asphalt paving. Any hazardous debris materials would be classified as such and disposed of accordingly. Furthermore, the presence of hazardous debris is anticipated to be very limited, if it occurs at all.

USC has an extensive management and tracking system for the handling of medical wastes generated by HSC facilities. The quantity of medical waste produced, as well as how it is treated and disposed of, is tracked and documented per the MWMA. About 90 percent of the medical waste generated at HSC is sent off-site to be sterilized and processed through a heat treatment process called autoclaving. About 7 percent of medical waste generated consists of pathological wastes and specimens, and pharmaceuticals comprise 3 percent, both of which must be incinerated in a medical waste incinerator. Various chemical and radioactive wastes are produced, most of which are disposed as chemical wastes after decay at permitted incineration facilities. In total, about 99 percent of the chemical hazardous wastes are incinerated, fuel blended[12] or treated.

[11] *For the purposes of this analysis, it is assumed that development activity on Development Site G would occur on paved portions of this particular Development Site and would not involve the demolition of the existing structures that currently occupy Development Site G.*

[12] *Fuel blending is a treatment process that involves combining, or blending, solvent and flammable liquid wastes with other fuels for use as fuel in cement kilns.*

c. Disposal Locations

The great majority of municipal solid waste disposed of in Los Angeles County is disposed at Class III landfills (Municipal Solid Waste Landfills), facilities for non-hazardous, household waste. Unclassified (Inert) Landfills are defined as facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. The City of Los Angeles does not own or operate any landfill facilities. As such, all solid waste generated within the City is disposed of at privately-owned landfill facilities.

Remaining landfill capacity within facilities located within Los Angeles County is declining, and, as a result, there continues to be a shortage of solid waste disposal capacity within Los Angeles County itself. As a result, the solid waste disposal needs of the County are increasingly being met by landfill facilities located outside of Los Angeles County. Based on data for 2003, over 20 percent of the County's solid waste disposal needs were met by landfill facilities located outside of the County of Los Angeles. Due to the difficulties of establishing new landfills or expanding existing landfills, it is forecasted that increasing amounts of the County's solid waste disposal will occur at out-of-County landfills in the future. In order to meet the solid waste disposal needs of Los Angeles County over the next 15 years, the amount of out-of-County disposal will need to increase three- to five-fold over current out-of-County disposal rates. Notwithstanding, as of January 2003, Sunshine Canyon Landfill received planning approval to operate a new, 55-million-ton capacity expansion within the City of Los Angeles. On May 13, 2003, the California Integrated Waste Management Board approved a permit for the initial phase of the expansion project that increases the disposal area by 84 acres with a new capacity of 7.53 million tons.

Privately owned companies handle the transport and treatment of the medical wastes generated at the HSC. Medical waste is currently sent for treatment at Thermal Combustion Innovators, Inc. in Colton, California. After undergoing a heat treatment process called autoclaving, the medical waste is considered municipal solid waste safe for disposal at a Municipal Solid Waste (or Class III) landfill (as defined in California Code of Regulations, Title 27, section 20164). Hazardous wastes are packaged, transported and handled by HazMat Services, Inc. in Anaheim, California. Management of radioactive wastes is overseen by the Nuclear Regulatory Agency, and the wastes are handled by licensed subcontractors. Philotechnics Environmental Services transports dry radioactive waste to the Pacific EcoSolutions, LLC facility in Richland, Washington, and all other radioactive waste services are managed by Thomas Gray and Associates in Orange, California.

Available inert landfills include the following: Azusa Land Reclamation, NU-Way Live Oak Landfill, Peck Road Gravel Pit and Reliance Pit #2. According to the County's 2003 Annual Report, as of December 31, 2003, the total remaining permitted inert waste capacity in Los Angeles County was estimated to be approximately 69.94 million tons. Based on the

average 2003 disposal rate of 1.2 million tons per year, this capacity would be exhausted in approximately 60 years (i.e., around 2065). Based on this data, it is concluded that there is no anticipated shortfall in disposal capacity for inert waste within the County.

3. Impact Analysis

a. Methodology

The solid waste analysis forecasts the municipal solid waste generated through construction activity and forecasts Project operations (including both municipal solid waste and medical waste) that would be generated by the proposed on-site medical uses. Furthermore, solid waste generation during Project operations is forecast for the total amount of waste generated by the Project, as well as the amount of solid waste that would actually be disposed of at a landfill (i.e., the total amount of waste minus the materials diverted from landfills via recycling, waste conversion to energy or incineration treatment).

The analysis of the proposed Project's municipal solid waste generation examines the potential for the disposal of inert demolition materials (e.g., asphalt paving) and construction debris during the Project's construction phase, and solid waste disposal during Project operations within Class III landfills. All medical wastes generated on the Project site would be properly transported for treatment off-site at privately-owned treatment facilities. Following processing at a licensed treatment facility, the medical wastes are sterile and classified as municipal solid waste and disposed of in Class III landfills.

Solid waste generation rates for municipal solid waste are based on existing operations at all USC facilities, whereas medical waste generation rates are based on current HSC operations. The results of these calculations (i.e., the Project's solid waste generation) are compared with the available capacity at the landfills that currently accept waste from the County of Los Angeles to assess the significance of the Project's solid waste generation.

b. Thresholds of Significance

Based on the criteria set forth in the *City of Los Angeles CEQA Thresholds Guide*, the proposed Project would have a significant impact if:

- The Project creates a need for an additional solid waste collection route, or recycling or disposal facility to adequately handle Project-generated solid waste.

- The Project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, City of Los Angeles Solid Waste

Management Policy Plan (CiSWMPP), the General Plan Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

c. Project Design Features

The Applicant, in recognition of the importance of recycling, has incorporated several Project Design Features targeted at reducing the Project's solid waste generation during Project construction as well as during long-term Project operations. Specifically, the Applicant would implement a demolition and construction debris recycling plan for all buildings constructed as part of the proposed Project, with the explicit intent of requiring recycling during all phases of site preparation and building construction. In addition, the Applicant has committed that during Project operations, the following Project Design Features would be implemented for the sole purpose of reducing the Project's solid waste generation:

- All structures constructed or uses established within any part of the proposed Project shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials;

- Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities; and

- The Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of future users of the Project clearly marked, durable and separate recycling bins on the same lot, or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

Based on current practices, USC's recycling programs, that would be extended to include the proposed Project, divert approximately 50 percent of the total solid waste generated at the University on an annual basis.

d. Project Impacts

(1) Construction

Construction debris would consist primarily of asphalt paving that would be disposed of as inert waste. Project construction activities may also generate solid waste that would be

disposed of at a municipal solid waste landfill. As of December 31, 2003, the total remaining permitted inert waste capacity in Los Angeles County was estimated to be approximately 69.94 million tons. Based on the average 2003 disposal rate of approximately 1.2 million tons per year, this capacity will be exhausted by about 2065 (i.e., approximately 60 years).[13] The quantity of asphalt paving to be removed from the Project site has been estimated at approximately 15,750 cubic yards, or approximately 25,200 tons. This forecasted solid waste generation is a conservative estimate as it assumes that Project development would occur on all Development Sites that are currently covered by asphalt (i.e., acres of asphalt surface area) and that no reductions in solid waste generation would occur due to recycling. The highly conservative nature of this assumption is evidenced by recent construction projects undertaken by the Applicant wherein nearly all of the removed asphalt has been recycled. Solid waste would also be generated during the construction of the proposed Project. Based on an average of 4.02 pounds of construction debris per square foot of construction that would need to be disposed of at an inert landfill,[14] construction of the Project at its maximum of 765,000 square feet and 840,000 square feet of parking structure construction would generate approximately 3,226 tons of construction debris. As shown in Table 1 on page 88, total solid waste generated by all Project construction activity would total approximately 28,426 tons. Based on this forecast, Project generated construction-related waste (i.e., asphalt and construction debris) would represent a small percentage (0.04 percent) of the inert waste disposal capacity in the region. This level of impact constitutes a less than significant impact, as the proposed Project would not create a need for additional solid waste disposal facilities to adequately handle Project-generated inert waste. As stated above, this estimate is very conservative because it assumes no construction debris would be recycled. Therefore, impacts relative to construction waste would likely be far less than the levels identified in this analysis based on the Applicant's construction practices with buildings such as those that would be constructed under the proposed Project.

The Applicant is committed to recycling practices through implementation of Project Design Features throughout the Project's design, construction and operations phases. Specifically, the Applicant would implement a demolition and construction debris recycling plan for all buildings constructed, with the explicit intent of requiring recycling during all phases of site preparation and building construction. The implementation of these practices would ensure that the construction phase of the Project is consistent with the solid waste objectives and polices of the SRRE and its updates, CiSWMPP, Framework Element, and Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Thus, Project construction would result in a less than significant impact with regard to implementation of the City's solid waste management policies and programs.

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[13] *County of Los Angeles, Department of Public Works, 2003 Annual Report on the Countywide Summary Plan and Countywide Siting Element, February 2005, page 43.*

[14] *U.S. EPA, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.*

Table 1

Solid Waste Generation During Project Construction

Waste Generation Factor	
Asphalt (Tons per Cubic Yard)	1.6
Building Construction (Tons per 1,000 sq.ft. of Construction)	2.0

Waste Generation (Tons)	
Asphalt [a]	25,200
Building Construction [b]	3,226
Total	**28,426**

[a] *Assumes that Development Sites A through E, which are currently asphalt parking lots, would be developed and that a one-acre site within development site G, which is currently paved with asphalt, would be developed. Currently, approximately one-half of Development Site F is covered in asphalt and it assumed to also be developed as part of the Project. It is also assumed that the asphalt is six inches thick and that all of this asphalt would be disposed of at an inert landfill. This is a very conservative assumption based on the Applicant's recent experience with construction projects wherein nearly all of the asphalt removed was recycled. Based on the aforementioned assumptions, a total of approximately 15,750 cubic yards of asphalt would be generated.*

[b] *Forecast of building construction solid waste is based on a total of 765,000 square feet of development, the maximum permitted under the proposed Project, 840,000 square feet of parking structure construction and a solid waste generation factor of 4.02 pounds of solid waste per square foot of construction.*

Source: PCR Services Corporation.

(2) Operation

Proposed Project operations would generate municipal solid waste and medical waste. The forecast of municipal solid waste is presented first, followed by the analysis of the Project's medical waste stream. The forecast of the solid waste generated during Project operations is presented in Table 2 on page 89. Based on solid waste generation rates obtained from the USC Recycling and Waste Management Program, a total of approximately 1.60 and 405.8 tons of solid waste would be generated on a daily and annual basis, respectively, based on the maximum amount of development that could occur under the proposed Project.[15] These estimates are conservative because they do not account for recycling. The importance of recycling cannot be understated in that the City achieved a diversion rate of 62 percent in 2002 (i.e., 62 percent of the solid waste generated by the City was recycled).[16] Waste reduction on-site (as part of diversion

[15] *Based on a maximum of 765,000 square feet of development and an average solid waste generation rate of 4.08 pounds per 1,000 square feet of development per day. This rate is based on a conservative estimate that the annual waste totals are generated on a five day per week operational schedule (or 260 days of operation per year), when in practice a portion of USC facilities generate waste six and seven days per week. This is conservative because by assuming a shorter operational schedule, the solid waste generation rate increases.*

[16] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, AB 939 compliance report for 2002.*

Table 2

Solid Waste Generation During Project Operation

Waste Generation Factor (per 1,000 sq.ft.)	
Municipal Solid Waste [a]	4.08 pounds per day
Medical Waste [b]	0.18 pounds per day
Waste Generation (Tons) [c]	
Daily	
Municipal Solid Waste	1.6
Medical Waste	0.1
Total	**1.7**
Annual	
Municipal Solid Waste	405.8
Medical Waste	17.9
Total	**423.7**
Diversion Rate	
Municipal Solid Waste	50%
Medical Waste	7%
Total Sent to Landfill (Tons)	
Daily	
Municipal Solid Waste	0.8
Medical Waste	0.1
Total	**0.9**
Annual	
Municipal Solid Waste	202.9
Medical Waste	16.6
Total	**219.5**

[a] *Based on current levels for all USC facilities.*
[b] *Based on current levels for USC HSC facilities.*
[c] *Forecast of solid waste is based on a total of 765,000 square feet of development, the maximum permitted under the proposed Project.*

Source: PCR Services Corporation.

and programs proposed as Project Design Features) would serve to promote the City's overall long-term diversion goal of 70 percent by 2020. Based on a diversion rate of 50 percent, the amount of Project generated solid waste that would actually be disposed of at a landfill would be 0.80 and 202.9 tons per day and on an annual basis, respectively.

Based on medical waste generation data obtained from the USC Environmental Compliance Program, a total of approximately 138 pounds and 17.9 tons of medical waste would

be generated on a daily and annual basis, respectively.[17] Of this amount, approximately 7 percent is diverted through incineration at the waste treatment stage. Based on a diversion rate of 7 percent, the amount of Project generated medical waste that would actually be disposed of at a landfill would be approximately 128 pounds per day and 16.6 tons on an annual basis, respectively.

Therefore, considering medical waste and municipal solid waste together, a total of approximately 1.7 and 423.7 tons of municipal solid waste would be generated by Project operations on a daily and annual basis, respectively, before diversion.

In considering the Project's contribution to the Countywide waste stream it is important to note that the Project's solid waste generation would constitute a very small fraction of the amount of solid waste generated in Los Angeles County on an annual basis. Specifically, the solid waste generated by the proposed Project at buildout, based on the maximum amount of proposed development (i.e., 765,000 square feet), would constitute 0.0018 percent of the 23.8 million tons of solid waste generated in Los Angeles County in 2003 and 0.0015 percent of the 27.5 million tons of solid waste forecasted to be generated in Los Angeles County in 2015 (i.e., the year of Project buildout). Based on a diversion rate of 50 percent for municipal solid waste and 7 percent for medical wastes, the actual amount of solid waste disposed of at a landfill would be slightly more than half of that identified above.

The City of Los Angeles currently does not own or operate any landfill facilities. Solid waste generated at the Project site would be picked up by a private contractor and ultimately deposited in a landfill accepting municipal solid wastes. Whereas in the past solid waste disposal occurred solely within landfills located in Los Angeles County, the trend in recent years is an increase in solid waste disposal at landfills located outside the County of Los Angeles. For example, in 2003 approximately 20 percent of the solid waste generated within Los Angeles County was disposed of at landfill facilities located outside of Los Angeles County.[18] Furthermore, the County of Los Angeles in its 2003 Annual Report to the Los Angeles County Integrated Waste Management Plan (the "2003 Annual Report"), concludes that the use of out-of-County landfills will increase in the future given the difficulties associated with permitting new or expanded landfill facilities within the County itself. As such, the proper current context within which to view the Project's potential solid waste impacts is total disposal capacity which consists of landfills located within, as well as outside of, Los Angeles County.

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[17] *Based on a maximum of 765,000 square feet of development and an average medical waste generation rate of 0.18 pounds per 1,000 square feet of development, per day and that medical waste is generated five days per week (or 260 days of operation per year), when in practice a portion of USC facilities generate waste six and seven days per week. This is conservative because by assuming a shorter operational schedule, the solid waste generation rate increases.*

[18] *County of Los Angeles, Department of Public Work, 2003 Annual Report Presentation, page 11.*

The Los Angeles County Integrated Waste Management Plan, inclusive of its annual reports, serve as the primary planning documents for the County's waste disposal needs, which includes solid waste generated throughout the City of Los Angeles. The 2003 Annual Report (the most recent available report), forecasts conditions over a 15-year planning horizon. With each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time to address any future shortfalls in landfill capacity. The 2003 Annual Report clearly concludes that there is enough capacity within permitted solid waste facilities (i.e., landfills) to serve Los Angeles County through the 15-year planning period of 2003–2018. The 2003 Annual Report specifically states that "the County of Los Angeles will protect the health and safety of all residents in the County by ensuring that solid waste disposal service, an essential public service, is provided without interruption through the 15-year planning period and in the long term".

Furthermore, the Los Angeles County Department of Public Works and the County Integrated Waste Management Task Force submitted the first Five-Year Review Report for the Countywide Integrated Waste Management Plan in June 2004 (the latest available report). The Five-Year Review Report was approved by the California Integrated Waste Management Board in September 2004. The February 2, 2004, transmittal letter for this report states that the "updated disposal capacity need analysis demonstrates that the County of Los Angeles meet the disposal capacity requirements of AB 939 by successfully permitting and developing all in-county landfill expansions, by more extensively utilizing out-of-County disposal capacity, and developing facilities utilizing conversion technologies to the extent technically feasible" (February 2, 2004, letter, page 1). The Five-Year Review Report states that the "remaining landfill capacity and the rate of depletion of that capacity give an indication of the ability of jurisdictions in the County to meet the solid waste disposal needs of their residents and businesses, thereby protecting public health and safety and the environment" (Five-Year Review Report, page 63). This report repeats the conclusion of the 2003 Annual Report that "the County continues to have adequate disposal capacity (i.e., greater than 15 years)" (Five-Year Review Report, page 65). The Five-Year Review Report's conclusions are based in part upon a survey of all cities within the County regarding their disposal rates and waste diversion programs.

Through a combination of extending the University's existing recycling program to include the Project (i.e., source separation, waste to energy and material recovery) and the Project Design Features outlined above, the Applicant has proposed a proactive program to address the solid waste impacts of the proposed Project. The combination of the Project's proposed design features in conjunction with the limited proportion of Countywide solid waste generation attributable to the proposed Project, supports the conclusion that Project operations would have a less than significant impact with regard to landfill disposal capacity.

The existing medical facilities that are part of the HSC already have regulatory compliant plans and procedures in place for the handling of medical wastes. These programs would be

extended to include the proposed Project. Thus, all Project-generated medical waste would be properly transported for treatment off-site by licensed subcontractors. Following treatment, Project generated medical waste would be classified as municipal solid waste and be disposed of in a Class III landfill. Medical waste constitutes approximately 5 percent of the Project's total waste stream before diversion, and thus does not amount to a substantial portion of the Project's total waste generated. Consequently, the disposal of medical wastes that may be generated during Project operations would be less than significant.

In summary, Project construction activities would generate asphalt debris from the demolition of existing paved areas and debris during building construction, but would not create a need for additional inert solid waste disposal facilities to adequately handle Project-generated inert waste. Thus, the Project's construction-related solid waste generation would result in a less than significant impact. Operation of the proposed Project may produce a maximum increase of 442 tons of solid waste in a year that would require disposal at regional landfills, although diversion and recycling programs would reduce the amount of waste requiring disposal by around 50 percent. It is anticipated that landfill disposal capacity would be available to accommodate the solid waste generated by the proposed Project. Although there is presently no guarantee that new or expanded disposal facilities will be opened by 2015, solid waste generated by the operation of the proposed Project would not materially alter the projected timeline for these landfills to reach capacity. Impacts to Class III solid waste disposal facilities would, however, be considered potentially significant. Mitigation measures are proposed below to require implementation of the Project Design Features, which serve to reduce these potentially significant impacts to a less than significant level. Furthermore, the applicable sections of the City of Los Angeles' Source Reduction and Recycling Element, the City's Solid Waste Management Policy Plan, General Plan Framework Element and the Curbside Recycling Program as well as the City's Space Allocation Ordinance (Ordinance No. 171687) that apply to private development projects all focus on the incorporation of recycling efforts into the design and operation of a proposed project. As the proposed Project implements the policy directives of these plans via the implementation of the Project Design Features that are expressly targeted towards solid waste recycling during Project construction in addition to a comprehensive recycling program that would be implemented during Project operations, the Project is consistent with the applicable referenced plans and policies, and a less than significant impact would result. In addition, the Project would also comply with the provisions of the City's Space Allocation Ordinance.

The existing HSC campus is served by a network of solid waste collection routes. As the Project proposes development within the existing HSC campus, Project development would not require the need for additional solid waste collection route(s). Thus, Project development would result in a less than significant impact with regard to this aspect of solid waste disposal.

A total of 30 major transfer stations and materials recovery facilities (i.e., facilities with a daily capacity of 100 or more tons per day) currently operate in Los Angeles County. These facilities currently handle less than 50 percent of their permitted capacities. Thus, a less than significant impact would result as implementation of the Project as proposed would not result in the need for additional recycling facilities.

4. Cumulative Impact

Development of the identified related projects would generate solid waste during their respective construction periods as well as on an on-going basis following the completion of construction. Table 3 on page 94 presents forecasted solid waste generation during construction and operations of the identified related projects unto themselves as well as in conjunction with the proposed Project. Based on this analysis, cumulative solid waste generation would amount to a total of 385,447 tons. In comparison to a remaining inert landfill disposal capacity of 69.94 million tons, cumulative construction debris, incorporating the conservative assumption that there is no recycling of construction wastes, constitutes 0.55 percent of the remaining inert landfill capacity. Based on this small percentage, cumulative impacts on inert landfill capacity are concluded to be less than significant.

During operations, cumulative solid waste generation is forecasted to be 47.4 and approximately 14,256 tons on a daily and annual basis, respectively. Cumulative annual solid waste generation represents 0.06 percent of the total solid waste generated in Los Angeles County in 2003. Using an average diversion rate of 50 percent, the percentage that cumulative development constitutes of annual solid waste disposal in Los Angeles County would be cut in half. Based on these small percentages, cumulative impacts on municipal landfill capacity are concluded to be less than significant.

The cumulative solid waste generation associated with the identified related projects could create a need for additional solid waste collection routes. Although this is considered a potentially significant cumulative impact, it is anticipated that such future development would be coordinated with applicable public and private waste haulers with regard to solid waste collection services, which would mitigate this potentially significant impact to solid waste collection services to a less than significant level. Furthermore, as the Project would have no impact on solid waste collection routes, cumulative impacts with regard to solid waste collection routes would be less than significant.

It is anticipated that the proposed Project and other related projects would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, the General Plan Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE, based on the programs in

Table 3

Forecast of Cumulative Solid Waste Generation

Land Use	Square Footage	Units/ Beds/ Rooms	Solid Waste Factors (pounds per 1,000 sq.ft.)		Solid Waste Generation (tons)		
						Operations	
			Construction [a]	Operations	Construction	Daily	Annual
Research Center	890,000		57,429	7	25,556	3.1	967.2
Medical Office	264,000		57,429	7	7,581	0.9	280.8
Hospital		169 [b]	57,429	16	4,125	1.4	509.6
Office	8,259,895		57,429	6	237,179	24.8	6,448.0
Retail	486,874		57,429	31	13,980	7.5	2,730.0
Restaurant	19,073		57,429	13	548	0.1	36.4
Museum	77,000		57,429	7	2,211	0.3	109.2
Hotel		750 [c]	57,429	4	21,536	1.5	546.0
Residential		931 [d]	62,571	12.23	45,147	5.7	2,074.8
School	88,096		57,429	7	2,530	0.3	93.6
Gas Station	8,000 [e]		57,429	31	230	0.1	36.4
Total Related Projects	10,092,938	1,850			360,621	45.7	13,832.0
Proposed Project					24,826	1.7	423.7
Total Cumulative Solid Waste Generation					385,447	47.4	14,255.7

[a] *Factors based on construction debris generated at the rate of 4.02 and 4.38 pounds of construction debris per 1,000 square feet of commercial and residential construction, respectively (U.S. EPA Report, 530R98010, page A-1, June 1998). This amount is equal to 7 percent of the solid waste generated during the construction of each related project. The balance of the solid waste generated during construction is assumed to be generated by demolition and site clearance activities.*

[b] *Total square footage calculated based on 850 square feet per hospital bed.*

[c] *Total square footage calculated based on 1,000 square feet per hotel room.*

[d] *Total square footage calculated based on 1,500 square feet per residential unit.*

[e] *Total square footage calculated based on 1,000 square feet per pump.*

Source: PCR Services Corporation.

place to meet such diversion requirements. Impacts to solid waste policies and objectives intended to help achieve the requirements of AB 939 from implementation of the proposed Project and related projects would not be cumulatively significant.

5. Mitigation Measures

Mitigation Measure F.3-1: The Applicant shall comply with the provisions of City of Los Angeles Ordinance No. 171687 with regard to all new structures constructed as part of the proposed Project.

Mitigation Measure F.3-2: The Applicant shall implement a demolition and construction debris recycling plan for all buildings constructed as part of the

proposed Project, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Mitigation Measure F.3-3: All structures constructed or uses established within any part of the proposed Project Site shall be designed to be permanently equipped with clearly marked, durable, source sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials.

Mitigation Measure F.3-4: Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.

Mitigation Measure F.3-5: The Applicant shall coordinate with the City of Los Angeles to continuously maintain in good order for the convenience of concessionaires, patrons, and employees clearly marked, durable and separate recycling bins on the same lot, or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

6. Significance After Mitigation

The proposed Project would create an incremental increase in solid waste disposal in the City of Los Angeles. Construction of the proposed Project would not result in an increase in inert solid waste generation that would create a need for additional inert solid waste disposal facilities to adequately handle Project-generated inert waste. Thus, construction-related waste would result in a less than significant impact. Operation of the proposed Project would generate an estimated increase of 1.7 tons per day of Class III solid waste, and an increase of 423.7 tons per year based on the maximum amount of proposed Project development. As the County is forecasting that landfill disposal will be available for the next 15 years, and in the long-term, in conjunction with the small percentage of Countywide solid waste that would be generated by the proposed Project, impacts associated with the Project's solid waste generation are concluded to be less than significant.

The proposed Project would not conflict with the solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Consequently, impacts relative to adopted solid waste diversion programs and policies would be less than significant. As Project development would be served by existing solid waste collection routes, Project impacts with regard to the need for additional solid waste collection routes would be less than significant.

Cumulative impacts with regard to landfill disposal capacity; consistency with adopted City solid waste plans, policies and programs; and solid waste collection routes are concluded to be less than significant.

V. ALTERNATIVES TO THE PROPOSED PROJECT

There are no corrections or additions to this section of the Draft or Revised EIRs.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

There are no corrections or additions to this section of the Draft or Revised EIRs.

VII. REFERENCES, PREPARERS, AND PERSONS CONSULTED

Add the following references to Section VII.A on page 345 of the Draft EIR:

Los Angeles County Department of Public Works, 2003 Annual Report to the Los Angeles County Integrated Waste Management Plan, February 2005.

Los Angeles County Department of Public Works and the County Integrates Waste Management Board, Five–Year Review Report for the Countywide Integrated Waste Management Plan, February/June/September 2004.

City of Los Angeles, Source Reduction and Recycling Element.

City of Los Angeles, Solid Waste Management Policy Plan.

IV. Responses to Written Comments

IV. RESPONSES TO WRITTEN COMMENTS
A. INTRODUCTION

CEQA Guidelines Section 15088(a) states that "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this Section of the Final EIR provides responses to each of the written comments received regarding the Draft and Revised Draft EIRs. Responses to the written comments received on the Draft EIR are presented first, and are followed by the responses to the written comments received on the Revised Draft EIR. Tables 4 and 5 on pages 98 and 101, respectively, provide a summary of the issues raised in response to the Draft EIR and Revised Draft EIR, respectively.

Table 4

Written Comments Summary
Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E. NOISE	IV.F. UTILITIES	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
1	Rodolfo Bocanegra, Project Planner Adelante Eastside Redevelopment Project CRA/LA 354 South Spring Street, Suite 800 Los Angeles, CA 90013-1235				●								
2	Karen A. Coca, Environmental Officer City of Los Angeles, Bureau of Sanitation Solid Resources Citywide Recycling Division 433 South Spring Street, Suite 500 Los Angeles, CA 90013									●			
3	Mike Bagheri, Transportation Engineer Department of Transportation City of Los Angeles						●						
4	Charles C. Holloway, Supervisor of Environmental Assessment Department of Water and Power 111 North Hope Street Los Angeles, CA 90012-2607									●			

Table 4 (Continued)

Written Comments Summary
Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E. NOISE	IV.F. UTILITIES	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
5	Terry Roberts, Director State Clearinghouse Governor's Office of Planning and Research 1400 Tenth Street, P.O. Box 3044 Sacramento, CA 95812-8044												Letter is procedural in nature, contains no substantive comments on EIR
6	Cheryl J. Powell IGR/CEQA Branch Chief Department of Transportation District 7, Regional Planning 100 Main Street, MS #16 Los Angeles, CA 90012-3606						●						
7	Alexander M. Man, Chairman Friends of Hazard Park and the Park Wetlands 4949 O'Sullivan Drive Los Angeles, CA 90032						●			●			Other comments related to biological resources, including treatment of on–site trees, and wetland in Hazard Park.
8	Larry Smith, Executive Director North East Trees 570 W. Avenue 26, Suite 200 Los Angeles, CA 90065												Comments relate to Biological Resources, as analyzed in the Initial Study

Table 4 (Continued)

Written Comments Summary
Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E. NOISE	IV.F. UTILITIES	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
9	Joyce Dillard P.O. Box 31377 Los Angeles, CA 90031	●	●		●	●	●	●		●		●	Other comments relate to Public Services, as analyzed in the Initial Study

Table 5

Written Comments Summary
Revised Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E. NOISE	IV.F. UTILITIES	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
R1	Mistie Joyce, Environmental Specialist II City of Los Angeles, Bureau of Sanitation Citywide Recycling Division 433 South Spring St. 5th Floor Los Angeles, CA 90013									●			
R2	Brian Wallace, Associate Regional Planner Intergovernmental Review SCAG 818 West Seventh Street 12th Floor Los Angeles, CA 90017												The letter acknowledges that SCAG has reviewed the Draft EIR and determined that the proposed Project is not regionally significant. It contains no substantive comments on EIR.
R3	Donald L. Wolfe, Director of Public Works Carlos Ruiz, Assistant Division Director, Environmental Programs Division County of Los Angeles Department of Public Works 900 South Fremont Avenue Alhambra, CA 91803-1331									●			

Table 5 (Continued)

Written Comments Summary
Revised Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	III.A ENVIRONMENTAL SETTING	III.B RELATED PROJECTS	IV.A LAND USE	IV.B VISUAL RESOURCES	IV.C TRAFFIC, CIRCULATION AND PARKING	IV.D AIR QUALITY	IV.E. NOISE	IV.F. UTILITIES	V. ALTERNATIVES	VI. GROWTH INDUCING IMPACTS	COMMENTS
R4	Joyce Dillard P.O. Box 31377 Los Angeles, CA 90031									●			
R5	Alexander M. Man, Chairman Friends of Hazard Park and the Park Wetlands 4949 O'Sullivan Drive Los Angeles, CA 90032							●		●			

LETTER NO. 1

Rodolfo Bocanegra, Project Planner
Adelante Eastside Redevelopment Project
CRA/LA
354 South Spring Street, Suite 800
Los Angeles, CA 90013-1235

COMMENT 1-1

The Community Redevelopment Agency's ("Agency") Adelante Eastside Redevelopment Project staff appreciates the opportunity to review and comment on the Draft Environmental Impact Report for the proposed USC Health Sciences Campus Project. The draft EIR provides a substantive analysis of the effects of the proposed USC Health Sciences Campus Project including the various CEQA Guideline alternatives.

The following preliminary comments request clarification or additional information about the proposed project in relation to the Adelante Eastside Redevelopment Plan ("Plan").

RESPONSE 1-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. This comment also provides an introduction to the more specific comments raised by Agency staff. The more detailed comments are addressed below in Responses 1-2 through 1-6.

COMMENT 1-2

The proposed activity at development sites A, B, C, D and G is consistent with the Plan's designation of Open Space /Other Public/Quasi Public land use. However, the Plan identifies industrial use for development sites E and F. The proposed medical and institutional use will require that a discretionary approval be reviewed and granted by the Agency Board of Commissioners. Prior to Agency Board consideration of a requested discretionary action, the proposed USC Health Sciences Campus Project development program plans for Sites E and F must be reviewed and considered by the Adelante Eastside Redevelopment Project Area Committee (PAC).

RESPONSE 1-2

Among the discretionary actions required to implement the Project is a General Plan Amendment to change the land use designation for Development Sites E and F from Limited Industrial to General Commercial. Section 1100 of the Adelante Eastside Redevelopment Plan indicates that the Community Plan states the following:

> "In the event that an applicable Community Plan is amended so as to change the land use permitted within the Project Area, the land uses specified for the Project Area in the applicable community plan as so amended, shall supersede the land use designations in this Redevelopment Plan".

Based on the above stated provisions, the proposed land use changes, once approved by the City Council, would supersede the land use designations within the Adelante Eastside Redevelopment Plan. As a result, the Project would be consistent with the Adelante Eastside Redevelopment Plan and the review of the proposed General Plan Amendment by the Agency Board and the PAC is not required.

COMMENT 1-3

The Draft EIR anticipates the approval of entitlements from the City for the development of the proposed USC Health Sciences Campus Project. Section 521 Variances, Conditional Use Permits, Building Permits and Other Land Development Entitlements of the Adelante Eastside Redevelopment Plan states "*No zoning variance, conditional use permit, building permit, demolition or other land development entitlement shall be issued in the Project Area from the date of adoption of this Plan unless and until the application therefore has been reviewed by the Agency and determined to be in conformance with this Plan and any applicable design guidelines or development controls adopted by the Agency*". This means that the Agency will have the opportunity to review and comment on the requested entitlements prior to the City's Planning Commission taking action,

RESPONSE 1-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

COMMENT 1-4

As indicated in the Draft EIR (page 62) and in accordance with Section 408.4 Development Plans of the Adelante Eastside Redevelopment Plan, all development plans within the redevelopment project area (whether public or private) shall be submitted to the Agency for approval and architectural review.

RESPONSE 1-4

As noted in the comment, the Project has incorporated the requirement of CRA/LA approval and architectural review per Section 408.4 of the Adelante Eastside Redevelopment Plan. The Project site's placement within the Adelante Eastside Redevelopment area and the requirement for review by the Community Redevelopment Agency is noted in several places in the Draft EIR, including Section IV, Land Use (p.76), which states specifically, "The Project Site is located within the City of Los Angeles' Northeast Los Angeles Community Plan area and within the Adelante Eastside Redevelopment Project. As such, the proposed Project is subject to the City of Los Angeles General Plan (the Plan), the Northeast Los Angeles Community Plan, the City of Los Angeles Municipal Code (LAMC), and the Adelante Eastside Redevelopment Plan, which is administered by the Community Redevelopment Agency of the City of Los Angeles."

COMMENT 1-5

Page 83; under Section (3) Adelante Eastside Redevelopment Plan of the Draft EIR, second sentence implies that the Plan was adopted in 1979 and amended in 1999. The plan was adopted by City Council under Ordinance No. 172514 on March 30, 1999, and has not to date been amended.

RESPONSE 1-5

Page 83 of the Draft EIR has been revised per the comment. Please refer to Correction and Addition No. IV.A-1.

COMMENT 1-6

We look forward to assisting you and the applicant with this important development. Please do not hesitate to contact me if you have any questions about this letter, or want to discuss scheduling briefings to the Adelante PAC. I can be reached at (213) 977-1685 or by email at rbocanegra@cra.lacity.org.

RESPONSE 1-6

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. This comment does not introduce new environmental information or provide specific comments regarding information presented in the Draft EIR. Therefore, no further response is necessary.

LETTER NO. 2

Karen A. Coca, Environmental Officer
City of Los Angeles, Bureau of Sanitation
Solid Resources Citywide Recycling Division
433 South Spring Street, Suite 500
Los Angeles, CA 90013

COMMENT 2-1

Staff of the Bureau of Sanitation, Citywide Recycling Division have reviewed the above DEIR and have the following comments.

The Initial Study for this project, in Section XVI (f), concludes that the project may have a Potentially Significant Impact in the area of waste disposal capacity for the project in particular, and in Los Angeles County in general. The IS states "Therefore, this issue shall be further documented and analyzed in an Environmental Impact Report". In addition, a letter of comment on the Notice of Preparation for the project from the County of Los Angeles, Department of Pubic Works, states that: "The pre- during, and past- construction activities associated with the proposed project will increase the generation of solid waste and may have potentially significant impact to solid waste management infrastructure in the County. Therefore, the DEIR must identify what measures the City plans to implement to mitigate the impact."

However, the DEIR does not mention solid waste generation or disposal. There is no discussion of the generation of solid waste during any phase of this project, nor of the impact which may be due to such generation, nor of any measure proposed to mitigate such impact.

RESPONSE 2-1

In response to this comment, a Revised Draft was prepared to include an analysis of the potential solid waste impacts of the project. The Revised Draft EIR was circulated, pursuant to the provisions of Section 15088.5 of the State CEQA Guidelines, to provide the public an opportunity to review and comment on the solid waste analysis. The solid waste analysis that was included in the Revised Draft EIR has been incorporated into the Final EIR via Correction and Addition No. IV.F-1.

COMMENT 2-2

In light of these omissions, the DEIR for this project or a supplement must be recirculated with the information, discussion, and proposed mitigations for the impact due to solid waste disposal.

Thank you for the opportunity to comment in this matter. If you have any questions or would like more information, please contact Mistie M Joyce at (213) 473-8233.

RESPONSE 2-2

In response to this comment, a Revised Draft EIR was circulated, pursuant to the provisions of Section 15088.5 of the State CEQA Guidelines, to provide the public an opportunity to review and comment on the solid waste analysis. The public review period for the Revised Draft EIR ran from August 18, 2005 through October 3, 2005. All comments received on the Revised Draft EIR were considered and have been responded to in Section IV.C of the Final EIR.

LETTER NO. 3

Mike Bagheri, Transportation Engineer
Department of Transportation
City of Los Angeles

COMMENT 3-1

The Department of Transportation (DOT) has reviewed the DEIR dated May 2005, prepared by the Los Angeles City Planning Department, and the supporting traffic study dated May 5, 2005, prepared by traffic consultant Linscott, Law & Greenspan, Engineers, for the proposed University of Southern California (USC) Health Sciences Campus (HSC) project located in East Los Angeles at 1510 San Pablo Street.

DOT has determined that the DEIR adequately responded to our attached comment letter, dated May 20, 2005, regarding the traffic study. As indicated in the DOT response letter, the traffic study analyzed eighteen intersections and determined that eleven of the intersections would be significantly impacted. Except as noted, the DEIR adequately evaluated the project-related traffic impacts on the surrounding community.

RESPONSE 3-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As a point of clarification, the DOT comment letter dated May 20, 2005 supported the traffic analysis provided in the Draft EIR, and did not identify any Project related traffic impacts on the surrounding community that were not adequately evaluated.

COMMENT 3-2

DISCUSSION AND FINDINGS

Project Description

The project consists of the construction of between approximately 585,000 gross square feet (GSF) (e.g., a maximum of 465,000 GSF of medical research facilities and a maximum of 120,000 GSF of medical clinic facilities) and 765,000 GSF of academic and medical-related research and office facilities (e.g., a maximum of 720,000 GSF of academic and medical research facilities and a maximum of 45,000 GSF of medical clinic facilities). Parking facilities will also be constructed for the future development within the existing USC HSC. The project sites currently contain surface parking lots, which would be removed, or are underdeveloped sites. Development would occur on up to seven sites designated as Sites A, B, C, D, E, F, and G.

Site	Location	Current	Proposed Maximum Development
A	Northside of Eastlake Avenue between San Pablo Street and roughly Biggy Street	Surface Parking Lot	Range from 120,000 GSF medical clinic facilities to 465,000 GSF academic and/or medical research facilities.
B	Southeast corner of San Pablo Street and Alcazar Street	Surface Parking Lot	Range from 120,000 GSF medical facilities to 295,000 GSF of academic and/or medical research facilities.
C	Northside of Zonal Avenue between State Street and Mission Street	Surface Parking Lot	Multi-story parking structure up to 2,800 parking spaces.
D	Northwest corner of Biggy Street and Zonal Avenue	Surface Parking Lot	Range from 59,000 GSF medical clinic facilities to 200,000 GSF academic and/or medical research facilities or up to 600 parking spaces.
E	Eastside of San Pablo Street between Valley Boulevard and Alcazar Street	Surface Parking Lot	Range from 118,000 GSF medical clinic facilities to 400,000 GSF academic and/or medical research facilities.
F	Westside of San Pablo Street between Valley Boulevard and Alcazar Street	Vacant	Range from 118,000 GSF medical clinic facilities to 400,000 GSF academic and/or medical research facilities.
G	South of Alcazar Street west of San Pablo Street	Underdeveloped	Range from 29,500 GSF medical clinic facilities to 100,000 GSF of academic and/or medical research facilities.

RESPONSE 3-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment accurately summarizes the Project description. No further response is required.

COMMENT 3-3

The study fully analyzed two scenarios for the provision of parking. Parking Scenario No. 1 analyzed transportation impacts if all project parking is located on the western side of the HSC at

Site C (access to which would be provided via Zonal Avenue). Parking Scenario No. 2 analyzed transportation impacts if all projected parking is located on the northern side of the campus at Site E (access to which would be provided via San Pablo Street and Alcazar Street) and Site F (access to which would be provided via San Pablo Street). If parking is proposed in any other combination, off-site impacts would be within the range identified under these two parking scenarios. The project is expected to be completed by year 2015.

RESPONSE 3-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment accurately summarizes the traffic and parking analysis for the Project. No further response is required.

COMMENT 3-4

The project will generate approximately 7,715 daily trips with 753 trips in the AM peak hour and 774 trips in the PM peak hour.

If you have any questions, please contact Eileen Hunt of my staff at (213) 972-8481.

RESPONSE 3-4

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment accurately re-states the Project's trip generation information. No further response is required.

LETTER NO. 4

Charles C. Holloway
Supervisor of Environmental Assessment
Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012-2607

COMMENT 4-1

Thank you for providing the Los Angeles Department of Water and Power (LADWP) an opportunity to comment on your Draft Environmental Impact Report (EIR) for the proposed USC Health Sciences Campus Project, as requested in your letter dated May 26, 2005. LADWP does not have any comments at this time. For reference, the proposed project is located on seven development sites, totaling approximately 22 acres, within the existing USC Health Sciences Campus. Collectively, the sites lie to the northeast of the Los Angeles County-USC Medical Center (see Thomas Bros. Maps, page 635, A2, B2 and C2).

The proposed project consists of the development of between 585,000 and 765,000 square feet of academic and medical research facilities as well as medical clinic facilities. The development sites currently contain surface parking lots and/or are undeveloped. Parking accommodations to support the proposed academic and medical-related uses are also included as part of this project.

RESPONSE 4-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment accurately summarizes the Project description. No further response is required.

COMMENT 4-2

As stated in the Draft EIR, in compliance with California Water Code Sections 10910 - 10925 and satisfying the requirements of Senate Bill 610, a Water Supply Assessment (WSA) was prepared for the proposed project and was evaluated and adopted by the Board of Water and Power Commissioners (Board) on March 22, 2005 (Resolution Number 005 186). The Board also found that its projected available water supply during normal, single-dry, and multiple-dry years, as included in its Urban Watershed Management Plan (UWMP), could accommodate the projected water demand associated with the proposed project, and that LADWP could provide sufficient domestic water supplies to the proposed project.

RESPONSE 4-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

COMMENT 4-3

Please continue to include LADWP in your mailing list and address any correspondence to the undersigned in Room 1044. If there are any additional questions, please contact Ms. Sarah Easley Perez of my staff at (213) 367-1276.

RESPONSE 4-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The LADWP will be included in the Project's mailing list and will address correspondence to the address noted. No further response is required.

LETTER NO. 5

Terry Roberts
Director, State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street, P.O. Box 3044
Sacramento, California 95812-8044

COMMENT 5-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 11, 2005, and the comments from the responding, agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code States that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we -recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

RESPONSE 5-1

The comment indicates that the State Clearinghouse of the Governor's Office of Planning and Research received the Draft EIR and that the City (Lead Agency) complied with the State Clearinghouse review requirements for draft environmental documents. Since this comment is not directed at the adequacy or the conclusions of the Draft EIR, no further response is required.

COMMENT 5-2

Document Details Report

State Clearinghouse Data Base

SCH# **200.4101084**

Project Title USC Health Sciences Campus Project

Lead AgencyLos Angeles, City of

Type **EIR**Draft EIR

Description The project is proposed to occur on seven development sites within the USC Health Science Campus (HSC). The seven development sites are identified as Development Sites A through G. The project consists of the development of between 585,000 and 765,000 SF of academic and medical research facilities as well as medical clinic facilities. The development sites currently contain surface parking lots and/or are underdeveloped. Parking accommodations to support the proposed academic and medical-related uses are also included as part of the project. The seven development sites comprise approximately 22 acres within the existing HSC. Actions requested by the applicant include: a General Plan Amendment from Public Facilities to General Commercial for Development Site C; a General. Plan Amendment from Limited Industrial to General Commercial for Development Sites E and F; a Zone Change from PF to C2 for Development Site C; a Zone Change for the Development Sites to establish [Q] and/or [D] conditions; a Height District Change from IVL to 2 for Development Site D; a Zone Change from CM-1 to C2-2 for Development Sites E and F; a Variance from the distance requirement for parking to be provided within 750 feet of the proposed use, the abandonment of Henry Street through either a merger and resubdivision or a street vacation; and possible subdivision actions.

Lead Agency Contact

Name Jimmy Liao

Agency City of Los Angeles

Phone (213) 978-1331 Fax

email

Address 200 N. Spring Street, Room 750

City Los Angeles ***State*** CA ***Zip*** 90012

Project Location

County Los Angeles

City Los Angeles, City of

Region

Cross StreetsZonal Avenue / Biggy Street / San Pablo Street / Eastlake Avenue / Alcazar Street

Parcel No.

Township ***Range*** ***Section*** ***Base***

Proximity to:

Highways I-10, I-5

Railways UPRR

Waterways

Schools Francisco Bravo M.D. Magnet Senior HS

Land Use Vacant and/or surface parking / Zoning is PF (Public Facilities), CM (Commercial Manufacturing) and C2 (Commercial) / General Plan Designation is Public Facilities, Limited Industrial, and General Commercial.

Project Issues Aesthetic/Visual; Air Quality; Cumulative Effects; Growth Inducing; Landuse; Noise; Public Services, Schools/Universities; Sewer Capacity; Traffic/Circulation; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Office of Emergency Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control

Note: Blanks in data fields result from insufficient information provided by lead agency.

Date Received 05/26/2005 ***Start of Review*** 05/26/2005 ***End of Review*** 07/11/2005

RESPONSE 5-2

This comment provides the State Clearinghouse Database Report on the Project. Since this comment does not present any new environmental information or have specific comments on the content of the Draft EIR, no further response is required.

COMMENT 5-3

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS #16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-3747
FAX: (213) 897-1337

IGR/CEQA No. 050577AL, DEIR & TS
Referenced to IGR/CEQA No. 041046AL
USC Health Sciences Campus Project
Vic. City Wide, LA-05/PM 18.78, LA-10/PM 19.07
SCH # 2004101084

July 5, 2005

Mr. Jimmy Liao
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Wolfe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to construct academic and medical research facilities and medical clinic facilities.

We would like to remind you that any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of Transportation.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water.

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project. Thank you for the opportunity to have reviewed this project.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 050577AL.

Sincerely,

CHERYL J. POWELL
IGR/CEQA Branch Chief

RESPONSE 5-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The Applicant shall comply with all applicable Caltrans requirements, including application for an encroachment permit and a transportation permit to haul oversize materials, should such permits be needed to implement the Project. Furthermore, the Applicant shall ensure that designs used in construction and operations incorporate measures to avoid or minimize impacts regarding run-off discharge from the Project in accordance with all applicable regulations. In addition, a mitigation measure has been added requiring the preparation of a truck/traffic congestion management plan. Please refer to Correction and Addition No. IV.C-1.

LETTER NO. 6

Cheryl J. Powell
IGR/CEQA Branch Chief
Department of Transportation
District 7, Regional Planning
100 Main Street, MS # 16
Los Angeles, CA 90012-3606

COMMENT 6-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to construct academic and medical research facilities and medical clinic facilities.

We would like to remind you that any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of Transportation.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water.

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project. Thank you for the opportunity to have reviewed this project.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 050577AL.

RESPONSE 6-1

This comment is the same as Comment 5-3. As such please refer to Response to Comment No. 5-3. As indicated therein, the Applicant shall comply with all applicable Caltrans requirements and all applicable state and local regulations.

LETTER NO. 7

Alexander M. Man, Chairman
Friends of Hazard Park and the Park Wetlands
4949 O'Sullivan Drive
Los Angeles, CA 90032

COMMENT 7-1

Friends of Hazard Park & Park Wetlands due to errors and omissions and vague, meaningles [sic] mitigation measures, believes the above referenced Draft Environmental Impact Report (DEIR) is not in compliance with the California Environmental Quality Act (CEQA), or the Los Angeles City Ceqa [sic] Guidelines, for the following reasons:

RESPONSE 7-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. Due to the omission of the Project's solid waste analysis from the Draft EIR, that particular analysis was recirculated to the public in a Revised Draft EIR for review and comment pursuant to CEQA Guidelines Section 15088.5. None of the other issues raised in this or any other letter included in the Final EIR results in the disclosure of new significant information warranting further recirculation of the Draft EIR. Therefore, the City of Los Angeles has no legal obligation to further recirculate the Draft EIR. Specifically, according to CEQA, new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of a project or a feasible way to mitigate or avoid such an effect, including a feasible project alternative, that the Applicant has declined to implement. Criteria which defines new significant information, and by which the recirculation of a draft EIR is mandated, are listed in CEQA Guidelines Section 15088.5. These include:

- A new significant environmental impact that would result from the project or from a new mitigation measure proposed to be implemented (Section 15088.5 [a][1]).

Proposed Project development based on the information provided within this letter would not result in a new significant environmental impact.

- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of significance (Section 15088.5 [a][2]).

The comments presented in this letter provide no evidence of any substantial increases in environmental impacts identified in the Draft EIR that would need to be further mitigated as a result of the identified increase.

- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it (Section 15088.5 [a][3]).

The comments presented in this letter provide no evidence that any new feasible alternatives or mitigation measures, different from the alternatives and mitigation measures presented in the Draft EIR, would clearly avoid all of the significant and unavoidable impacts of the Proposed Project.

- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (Section 15088.5 [a][3]).

The Draft and Revised EIRs provide a comprehensive and adequate analysis of the potential environmental impacts of the proposed Project. The content and the public review process of the Draft and Revised EIRs provided substantial opportunity for meaningful public review and input.

As supported by substantial evidence in the public record, it is concluded that none of the four circumstances described above apply to the Draft and Revised EIRs for the proposed Project. The corrections and additions included within the Final EIR, primarily "clarify" and make changes to the Draft EIR that do not alter the conclusions of the Draft EIR.

In closing, the following can be concluded with regard to the Draft EIR: (1) the Draft and Revised EIRs disclosed the proposed Project's unavoidable and significant impacts and recommended all known feasible mitigation measures; (2) no new significant information as defined under CEQA Guidelines Section 15088.5(a) has been identified; and (3) the public has been given a meaningful opportunity to comment on these potential impacts. CEQA Guidelines provisions requiring further recirculation under specific conditions are not applicable to the Draft and Revised EIRs and, as such, the City has no legal obligation to recirculate the Draft and Revised EIRs.

This comment provides an introduction to the more specific comments raised in the balance of this letter. These comments are addressed below in Responses 7-2 through 7-6.

COMMENT 7-2

1) OMISSION: Water Resources, pages 275-340 of DEIR Water Resources sections of report omits any mention of possible ground water depletion to the Hazard Park Wetland that could occur during and after the seven (7) extensive excavations within the 22 acre construction project on the Health Sciences Campus of the University of Southern California.

FACT: The Hazard Park Wetland, which has been certified as a wetland by the U.S. Fish And Wildlife Service, is dependant on local ground water. Potential loss of the present ground water supply to the wetland, from the 7, large, deep building foundations (some of which may have connecting underground tunnels) could irreparably damage the Federally identified and endorsed wetland in Hazard Park. Federally identified wetlands are a protected environmental resource under United States environmental law.

RESPONSE 7-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment accurately states that the Project could occur on up to seven sites, however it is not anticipated that Project development would result in extensive excavations. While groundwater may be encountered during building excavation activities that may necessitate dewatering, the extent of dewatering that could occur is not anticipated to be of a sufficient magnitude to have an adverse impact on groundwater conditions in the Project area, including, but not limited to, Hazard Park (i.e., including, but not limited to, the wetlands that may be present within the Park).

COMMENT 7-3

2) ERROR: The DEIR does not contain any information on the biological resources in Hazard Park; having dismissed them in the Initial Study that was prepared for the Nov. 4, 2004 meeting at the U.S.C. Medical School. Page B-7 states that Hazard Park has the potential to contain notable biologigical [sic] resources. FACT: Enclosed Fish and Wildlife letter verifies the fact that it contains wildlife and native plants based upon their visit to the park on February 27, 1997, typical of a wetland environment.

RESPONSE 7-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The Project's Initial Study correctly concludes that the Project would have no impact on biological resources including, but not limited to, those that may be present in Hazard Park. The Project Site is in an urbanized location and is primarily developed with surface parking. As concluded in the Initial Study (see Appendix A to the Draft EIR), the Project Site does not contain any natural hydrologic features or federally protected wetlands as defined by Section 404 of the

Clean Water Act. In addition, project development would not result in any direct or indirect alteration to Hazard Park. Furthermore, and as discussed in the Initial Study, (Section IV, Biological Resources), Hazard Park has the potential to contain notable biological resources. However, the Project Site is physically separated from Hazard Park such that there is no direct interface between the Project Site and the Park. While Development Site A and the park are located at opposite corners of the San Pablo Street/Eastlake Avenue/Norfolk Street intersection, actual buildings proposed on Development Site A would be separated from Hazard Park not only by San Pablo Street and Eastlake Avenue/Norfolk Street, but also by the ornamental landscape buffer that exists directly north of Eastlake Avenue. Development Sites B, C, D, E, F, and G are located further from Hazard Park and are separated from the Park by other HSC buildings. Therefore, due to the distance and the actual physical separation that exists between the Project site and the Park, the Project would not have an impact, either directly or through habitat modification, on any species that may inhabit Hazard Park. Therefore, the Project would not result in any impact, either directly or indirectly, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. As such, no impacts would occur with Project development, and no mitigation measures are necessary.

COMMENT 7-4

3) OMISSION – ERROR: Playground street, a heavily used access street to Hazard Park is not listed on several local street listings in the DEIR, ENV-2004-1950.

FACT: The many athletic leagues and Lincoln Heights residents who use Hazard Park depend on Playground Street as their most convenient access to the park's recreation building, ball diamonds, soccer area and parking lot. There's no parking access from the Soto Street side of Hazard Park, which emphasizes the importance of continued access to Hazard Park's facilities for East Los Angeles residents and visiting athletic teams.

QUESTION? – How does the future of Playground Street, a street of well maintained homes, of residents with modest incomes, many of whom have lived there for many years, fit into the expansion plans for the U.S.C. Health Sciences plan?

RESPONSE 7-4

The Project does not propose any changes to Playground Street or to any of the access points to Hazard Park. Furthermore, the Draft EIR concludes that Project impacts on the streets that provide direct access to Hazard Park would be less than significant with the implementation of the identified mitigation measures, which would be assured via the Project's Mitigation Monitoring and Reporting Program (see Section II of this Final EIR).

COMMENT 7-5

4) OMISSION: Page 12, DEIR: Neither the Environmental Assessment Form or [sic] the DEIR provide information, biological or numerical, on the number, type, size of trees to be removed at all of the Health Sciences building sites.

FACT: Existing trees have an important function in catching the particulates will be generated during the 10 year long construction program on the 22 acre's seven construction sites. Replacement trees referred to as mitigation measure will take 15–25 years to reach a level of maturity that will enable them to catch substantial amounts of particulates and absorb the carbon dioxide from the heavy construction equipment. Local residents will even lose the modest tree protection they now have.

RESPONSE 7-5

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. Any street trees requiring removal as a result of the Project would occur in accordance with the City of Los Angeles Street Tree Division requirements and would be replaced per these requirements. The Project is likely to include landscaped areas in the final site design that would add to, rather than decrease, the number of trees in the Project area. Furthermore, the number of trees that may be removed are of such a relatively small number such that the difference in tree size is inconsequential in terms of reducing air pollutants in the atmosphere.

COMMENT 7-6

Alexander M. Man
Chairman
FOCUS
P.O. Box 1711
Santa Monica, CA 90406

Re: Wetland in Hazard Park, City of Los Angeles, Los Angeles County, California

This letter is in response to your written request, dated September 16, 1996 and received by the Service on December 13, 1996, to have the Fish and Wildlife Service (Service) evaluate a wetland within Hazard Park near the University of Southern California Medical Center in the City of Los Angeles, Los Angeles County, California. It is our understanding that your goal is to have the wetland within the recently abandoned railroad right-of-way owned by Southern Pacific Railroad restored and enhanced for biological, educational, and aesthetic purposes.

Gina Shultz of my staff met with you at the wetland site on February 27, 1997. The site is currently dominated by exotic species such as giant reed (*Arundo donax*), castor bean (*Ricinus communis*), acacia (*Acacia* sp.), eucalyptus (*Eucalyptus* spp.), palm tree, and pine tree. However, the site also supports native species such as mule fat (*Baccharis salicifolia*), willow (*Salix* sp.), and cattail (*Typha* sp.). A variety of birds, including but not limited to downy woodpecker (*Denarocopos pubescens turati*), common yellowthroat (*Geothlypis trichas*), bushtit (*Psaltriparus minimus minimus*), Anna's hummingbird (*Calypte anna*), California towhee (*Pipilo crissalis*), scrub jay (*Aphelocoma coerulescens obscura*), northern mocking bird (*Mimus polyglottos polyglottos*), and American crow (*Corvus brachyrhynchos hesperis*), were detected on-site. The wetland is currently used by the adjacent Francisco Bravo Medical Magnet High School for the study of plants, animals, and water quality. The school would like to continue using it as an educational tool and has also expressed interest in participating in any future wetland restoration efforts.

Because wetland habitat is an essential and important habitat type, particularly as nesting and foraging habitat for migratory birds, and since more than 91 percent of the wetlands in California have been lost (Dahl 1990), it is the Service's goal to protect and restore this habitat. In addition, because wetlands are especially scarce and often degraded in urban areas, protection and restoration of wetland habitat within our inner-cities is as important component of this overall goal. The Service therefore agrees that the wetland near Hazard Park is an important natural resource worthy of protection and has tremendous potential for enhancement and restoration. Even in its current condition it provides habitat for a variety of migratory birds. In addition to its enhancement potential through removal of exotic plants and revegetation with native riparian and fresh water marsh species, the site has potential for creation of additional wetlands through removal of fill below and adjacent to the railroad track and revegetation with native wetland plants. Any restoration or creation activities would have to be authorized by the property owner, Southern Pacific Railroad. The site also provides a wonderful opportunity to educate the students at Francisco Bravo Medical Magnet High School in the filed [sic] of science, including local biological resources.

We commend you in your efforts to protect and restore the wetland near Hazard Park for its biological, aesthetic, and educational value. We encourage you to submit any restoration plans to us for our comment. If there is anything we can do to further assist you, please do not hesitate to contact Ms. Shultz at (619) 431-9440.

RESPONSE 7-6

Please refer to Response 7-3 for a detailed discussion of the lack of potential environmental impacts on the biological resources referenced in this letter due to proposed Project development. As indicated therein, the Project is located in an urbanized area and does not propose any direct or indirect impacts to biological resources, including the resources within Hazard Park. Therefore, the Project would not result in any impact, either directly or indirectly (e.g., through

habitat modification), on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. As such, no impacts would occur, and no mitigation measures are necessary.

LETTER NO. 8

Larry Smith
Executive Director
North East Trees
570 W. Avenue 26, Suite 200
Los Angeles, CA 90065

COMMENT 8-1

It is with great pleasure that we correspond with you regarding the DEIR for USC's Health Sciences Campus. Recently, North East Trees mailed out stakeholder letters to the public agencies involved [sic] the Hazard Creek Wetlands Project. As a result of those discussions, it came to our attention, that USC and the City of Los Angeles are proposing a change in use of several of the surface parking lots that are adjacent to Hazard Park's Wetland. We want to submit our comments to you, so that you become aware of our project, and include its hydrological resources in your study of environmental impacts on the proposed expansion of institutional uses and public facilities at USC's Health Sciences campus.

RESPONSE 8-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As a point of clarification, only Development Site A is located in proximity to Hazard Park. Development Sites B through G are all located more than 500 feet from Hazard Park and are further separated from Hazard Park by the existing USC structures that are located between proposed Development Sites B through G and Hazard Park. This comment also provides an introduction to more specific comments, which are addressed below in Responses 8-2 through 8-4.

COMMENT 8-2

The final EIR should include mention of Hazard Creek from Norfolk Street to Marengo Street. This creek was used as a rail line from the early 20th century, through the 1970's. In a report entitled, "Hazard Park Wetland: hydrology, biology, and conceptual restoration plan," prepared for the Los Angeles and San Gabriel Rivers Watershed Council in 1998, Dr. Edith Read, Manager of Biological Resources of Psomas Associates, documents the creek's history and classification:

> *Establishment of the rail structure caused normal flows to lose their meandering nature and run in a more linear pattern, but fortunately there is no evidence that the railroad construction significantly altered the width or hydrological capacity of the channel... Technically, Hazard Creek is an F6 (1) stream type in Valley Type 8, according to the Rosgen system of classification. This means the channel is highly entrenched, moderately*

sinuous, and the channel substrate is primarily clay and silt with occasional bedrock exposure, Channel gradient is less than 2%.

North East Trees received design and planning funds to restore this creek. Discussions have been taking place since 1998 with the City of Los Angeles Department of Recreation and Parks, the Army Corps, the Los Angeles County Flood Control District, the Los Angeles Unified School District, City Council District 14, Assembly District 45, and University of Southern California. The project received letters of support from then-Councilman Antonio Villaraigosa for additional grant funds to build the stream improvements. To date, the Earth Island Institute has granted North East Trees $180,000 through the State Coastal Conservancy. The wetland is recognized by various governmental jurisdictions, and should be referenced in the final EIR.

RESPONSE 8-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As requested by the commentor, the presence of Hazard Creek, within Hazard Park, from Norfolk Street to Marango Street, is acknowledged. The presence of potential biological and wetland resources within Hazard Park was also acknowledged in the Project's Initial Study (see Appendix A of the Draft EIR, Attachment B, Section IV, Biological Resources). Furthermore, as concluded in the Project's Initial Study, and elaborated on in Responses to Comments 7-2 and 7-3, the Project does not propose any direct or indirect alteration to Hazard Park nor impact any biological resources that may be present in Hazard Park. Additionally, it should be noted that the USGS has not mapped any "blue line" streams in Hazard Park [19] (i.e. the USGS topographical maps for the Hazard Park area do not contain any "blue line" streams). Therefore, the Project would not result in an adverse effect on any federally protected wetlands or potentially federally protected wetlands and no further analysis of potential impacts on wetlands was required.

COMMENT 8-3

The final EIR should discuss this project, as well as the hydrological conditions of the USC-owned parcels, which should document the historic creek: Storm water conveyance and ground water resources like the underground spring that feeds the creek should be mentioned. The final EIR should also address the increased levels of urban and storm run off based on the reduction of permeable surfaces and the increase in paved and developed surfaces. We would recommend that reclaimed water be considered on the USC properties, as a mitigation to reduce run off and other potential impacts on the soon to be naturalized creek/wetlands. Hydrological characteristics of the natural historic stream at Hazard Park including existing drainage patterns and those expected after the project, with alternatives and mitigations should be included in the

[19] *United States Department of Interior, Geological Survey, Los Angeles Quadrangle, 1966, photo revise 1981, minor revision 1994.*

final EIR. For example a parking lot could contain swales and cisterns to reduce runoff and encourage on site capture.

The Hazard Creek and Wetlands project can provide many health and open space and natural resource benefits to the immediate community and to employees and visitors to USC's Health Sciences Campus. Where there are currently homeless encampments, graffiti, and large bulky items dumped in the degraded streambed, the stream restoration is envisioned to repair the environment and provide a place for people to enjoy nature in the city. The City of Los Angeles Sanitation Bureau identifies Hazard Creek as a site for public funding from the Baykeeper lawsuit settlement, it has been recommended for Proposition 50 Chapter 8 water quality funding. There is also a strong potential for connecting a proposed path at the Hazard Creek/Wetlands Project with proposed paths on USC-owned property north of the park.

As our projects present so many wonderful opportunities to enhance public health and active recreation, while improving our natural resource conservation, we look forward to working closely with you to bring these efforts to the most successful conclusion possible.

RESPONSE 8-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As stated in Responses 7-2, 7-3 and 8-2, there are no hydrological connections between the Project Site and Hazard Park, including, but not limited to, Hazard Creek.

All seven proposed Development Sites, as stated in the Project's Initial Study (see Appendix A of the Draft EIR, Attachment B, Section VIII, Hydrology and Water Quality), currently drain into the City's storm drain system which currently meets the storm drain needs of the Project Site. Thus, no hydrologic connections currently exist between the Project Site and Hazard Park. While the Project proposes to develop one or more of the proposed Development Sites, all of the seven Development Sites with the exception of Development Site F are currently almost entirely covered with impervious surfaces. As such, Project development would not increase surface runoff or existing drainage patterns from Development Sites A, B, C, D, E and G. In actuality, surface runoff may decrease as Project development would likely introduce landscaped areas that would introduce new pervious surfaces which do not currently exist. While the potential development of Development Site F would increase impervious surfaces on this one Development Site, the resultant increase in surface water is not anticipated to have an adverse impact on Hazard Park due to the ability of the City's storm drain system to convey the increased flows from this one Development Site as well as the overall distance between this particular Development Site and Hazard Park.

Furthermore, all new construction would occur in accordance with all applicable regulations (e.g., NPDES, SUSMP and SWPPP), which require measures that would improve water quality

conditions in relation to those which presently occur. For example, the Project would comply with a statewide general construction permit, per the State Water Resources Control Board. This permit allows storm water discharge under certain conditions during the construction period but is intended to minimize the pollution of downstream receiving waters from construction activities. In addition, the Project would be served by engineered drainage systems that would connect to the existing storm drain system and would be designed to meet all applicable National Pollution Discharge Elimination Systems (NPDES) permit requirements.

Therefore, it is also concluded, based on the preceding analyses, that Project development is not anticipated to result in substantial erosion or siltation on- or off-site during Project construction and operations. As the Project would have less than significant impacts with regard to surface water runoff quantities and Hazard Park, including, but not limited to, hydrologic impacts, no mitigation measures including any utilizing reclaimed water at the Project site are required or recommended.

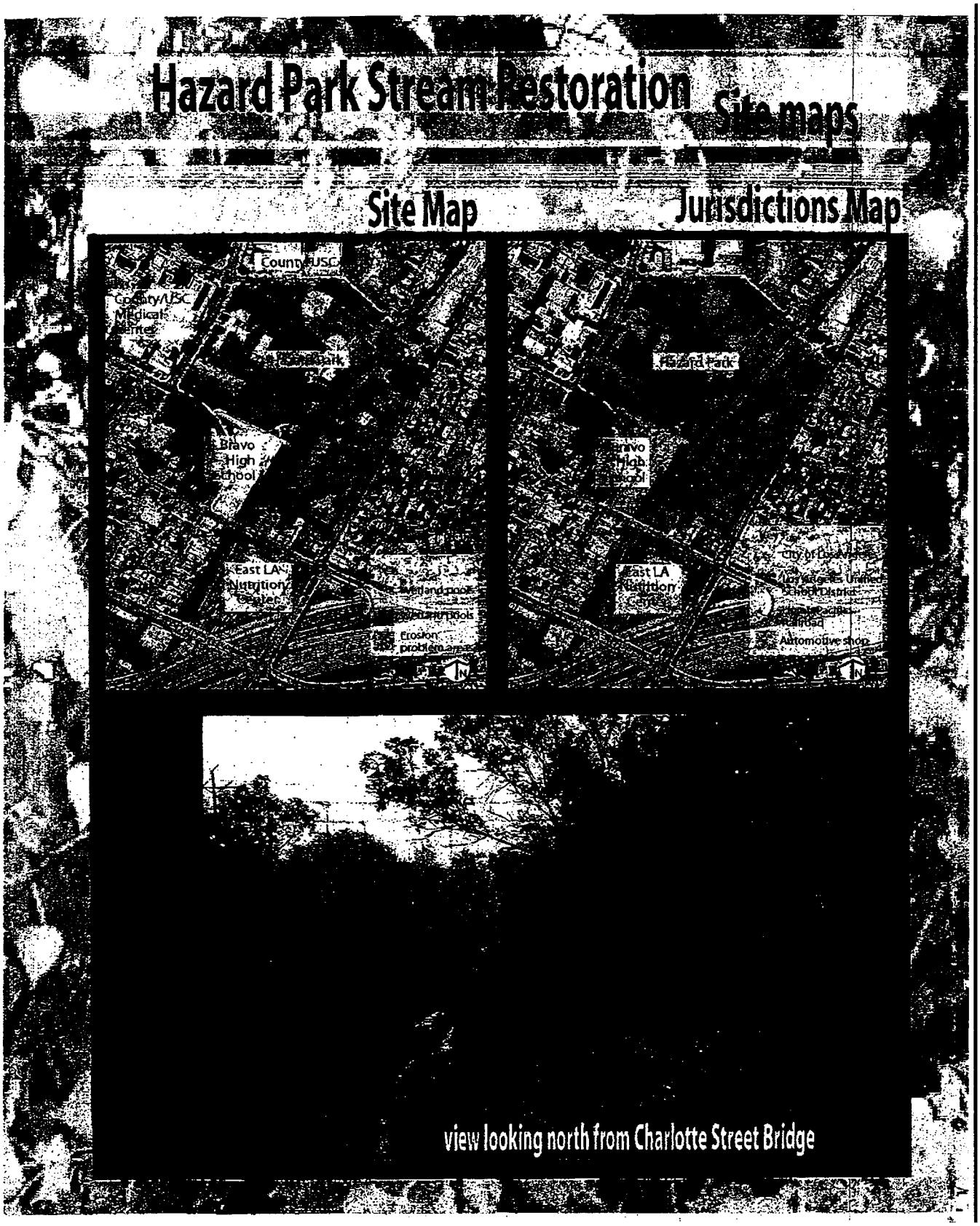
The Draft EIR includes an analysis of alternatives consistent with the requirements for such analyses as set forth in the CEQA Guidelines. As Project impacts with regard to hydrologic conditions within Hazard Park are less than significant, there is no basis under CEQA that requires alternatives to address issues for which the Project has a less than significant impact.

Furthermore, the Project would not require the use of groundwater as potable water for the Project would be supplied by the Los Angeles Department of Water and Power, which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the water needs of the Project would have no impact on local groundwater supplies.

In conclusion, Project construction and operations would result in less than significant impacts to surface water runoff, water quality, and groundwater resources and supplies. As such, no mitigation measures are required or recommended. Consequently, potential groundwater impacts to the spring feeding Hazard Creek and potential for run off from the Project site to reach or otherwise negatively impact Hazard Creek or its sources would be less than significant. As such, no mitigation measures preventing run-off to Hazard Creek are required or recommended.

COMMENT 8-4

Hazard Park Stream Restoration Site Maps *[These maps are reproduced on pages 130 and 131.]*


Hazard Park Stream Restoration Site maps
Site Map
Jurisdictions Map
County/USC Medical Center
Hazard Park
Bravo High School
East LA Nutrition Center
Wetland pools
Erosion problem area
Automotive shop
N
view looking north from Charlotte Street Bridge

Hazard Park Stream Restoration

Concept Restoration Plan

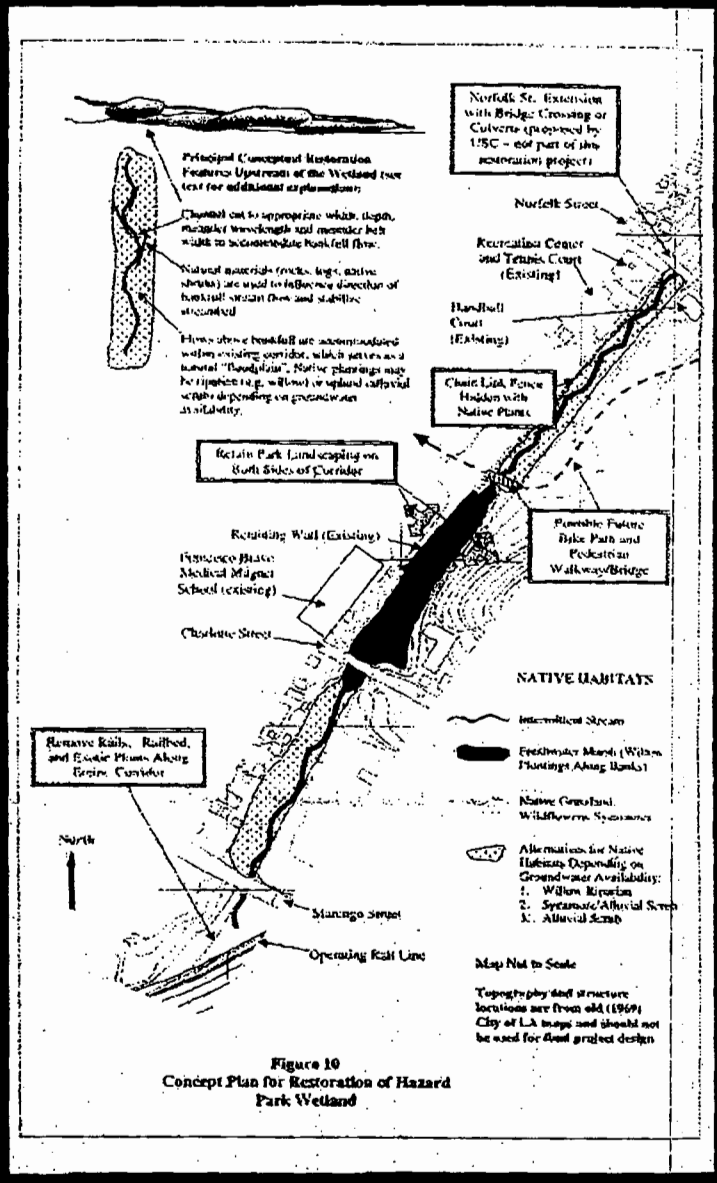


Figure 10
Concept Plan for Restoration of Hazard Park Wetland

From Hazard Park Wetland Restoration Plan
by Psomas Engineering, 1996

RESPONSE 8-4

The materials presented in this comment are addressed in Response 8-2, above, which states that Hazard Creek and jurisdictional wetlands may be present within Hazard Park and the Project is not anticipated to present potential impacts to either the creek, the wetlands within the area, or other biological resources that may be present within Hazard Park. Additionally, and as stated in Response to Comment 8-2, above, the USGS has not mapped any "blue line" streams in Hazard Park.

LETTER NO. 9

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

COMMENT 9-1

The document is insufficient in current need assessments and future need assessments for a project of this magnitude; and as such, should not be approved.

RESPONSE 9-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

COMMENT 9-2

Let us start with the obvious:

AVAILABILITY OF DRAFT EIR:

This document was accessible through the Internet on the City website:

http://cityplanning.lacity.org

However, the City allowed no printing of any part of this document and the "Notice of Completion and Availability of Draft Environmental Impact Report No. ENV-2004-1950-EIR." We find this highly unusual for a Public Record to be restrictive to the Public. This is a substantially large EIR and Project estimated in the billions.

We purchased a CD-ROM for $7.50 for better accessibility. Again, the City allowed no printing of any part of the document.

We asked for Volume II of the document a week before comment period. Only two copies were available at the Community Planning Department at Downtown City Hall. We were allowed to borrow a copy and photocopy the document itself.

Our computer availability access is limited due to time restrictions imposed on public-use computers.

The surrounding area is low-income and qualifies for Department of Housing and Urban Development (HUD) Community Development Block Grant Funds (CDBG) and is a State Enterprise Zone.

Copies were only available at the following libraries:

Central Library—Downtown LA
Malabar Branch Library—Boyle Heights
Benjamin Franklin Branch Library—Boyle Heights
Lincoln Heights Library—Lincoln Heights

As a courtesy due to a serious computer security problem, additional time for comments should be extended for this extensive EIR.

RESPONSE 9-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The Draft EIR was distributed and made available for public review in compliance with Section 15087 of the CEQA guidelines. Since the availability of the documents complied with all CEQA requirements, there is no need to extend the comment period on the basis of document availability. Furthermore, the City in making the Draft EIR available on a CD-ROM as well as posting it on the City's website goes well beyond all CEQA requirements. In addition, the Draft EIR was made available at all of the Los Angeles Public Libraries located in the vicinity of the Project Site.

COMMENT 9-3

AREAS AFFECTED AND THE REAL ESTATE MARKET:

Regions affected by this project include more than the Northeast Los Angeles communities of Lincoln Heights, Boyle Heights and El Sereno. Employment and traffic from the Westside, Valley, San Bernardino County, Orange County, and Riverside County should affect this Project Area. Pasadena and the Arroyo Seco Region and especially Cal Tech will provide businesses and research projects that are "cousins" to this industry. All aspects of the environment will be affected.

This EIR clearly states that employment will be drawn from the surrounding area; and growth would be insignificant.

VI. Other Environmental Considerations.

B. Growth Inducing Impacts—Page 343 reads as follows:

"Although the proposed Project would constitute infill development within the existing HSC, which by its very nature has a lesser growth-inducing impact than development of undeveloped areas, the impacts of Project implementation would include effects on or from land use, visual resources, traffic and parking, air quality, and noise. The purpose of the proposed Project is to provide more opportunities for USC faculty and students to work at the forefront of their respective specialty while continuing to provide outstanding patient care. This intent is consistent with the land use goals of the City to revitalize this community and, as such, the Project Site has been designated under the City's General Plan Framework as a Commercial Center. While the proposed Project would not involve the construction of housing or generate a significant population increase resulting from new employees associated with the proposed Project, the proposed land uses, related facilities and the respective populations that directly utilize them represent an increment of direct on-site growth."

The Lincoln Heights community is currently undergoing a siege in real property. Residences are being inspected by the City's Department of Building and Safety (LADBS) for code violations. HUD's CDBG program supplies federal funding for a program called PACE—Pro-Active Code Enforcement, originally intended for slum landlords, but now used against homeowners. Other departments in LADBS are issuing Orders of Compliance—Commercial to residential owners, BUT they fail to mail the order.

This constitutes the property as being "marked for market."

Those real estate "investors" who know real estate law, unfamiliar to the common man, like adverse possession, hostile possession and quiet title are in our local real estate market. They have taken advantage of elderly, ill homeowners or their heirs, including the heirs currently serving prison time, to "jump" title or quiet title these properties. "Wild" deeds are becoming common in a real estate market so undesirable that it took years on the market to sell a home.

Census Data and Household Income for the surrounding communities are as follows:

http://mcdc.missouri.edu/

Population Total:	
Lincoln, Heights, 90031	38,716
El Sereno 90032	46,837
Boyle Heights 90033	49,582
Total	136,135

Adult Population:

Lincoln Heights 90031	26,417
El Sereno 90032	32,511
Boyle Heights 90033	31,664
Total	90,582

Household. Income–Median:

Lincoln Heights 90031	$25,300
El Sereno 90032	$33,445
Boyle Heights 90033	$22,429
Total	$27,058

Household Income—Average:

Lincoln Heights 90031	$37,022
El Sereno 90032	$43,616
Boyle Heights 90033	$29,743
Total	$36,794

Vacant properties in the area have gone up in value from $67,320 assessed value (formerly $20,000–$40,000) to a $450,000 sales price.

From a March 20, 2005, Los Angeles Times article titled "Hotter than Beverly Hills 90210," is the following:

"On the other hand, neighborhoods where values were below the county median saw the greatest appreciation: Among the strongest performers were Lincoln Heights 90031, up 39.6%; El Monte 91731, up 30.6%; and Compton 90222, up 26.7%."

Homes have increased more than the 39.6% stated in this article. In actuality, they have risen in the hundreds of percent in the last few years.

These prices are not affordable to the communities in poverty that surround the area.

Poverty does afford developers tax credits and incentives to develop the area.

Lincoln Heights Historic Preservation Overlay Zone (HPOZ) was approved in the surrounding area without concern for the low-income property owners and renters including Senior Citizens. This added an extra expense to maintain small, old buildings; yet, it was perfectly designed for California Debt Limit Allocation Committee qualified developers to rehabilitate for a very low capital input of $8,500 per unit.

To conclude, ISSUES WERE [sic] ARE CONCERNED ABOUT GENTRIFICATION and GENTRIFICATION WITH USE OF FEDERAL FUNDS EARMARKED FOR POVERTY WITHOUT DIRECTLY AFFECTING THOSE IN POVERTY. HOW IS STUDENT HOUSING BEING ADDRESSED?

RESPONSE 9-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As stated in the Draft EIR, Section II, Project Description (p.58), the purpose of the Project is to improve and expand USC facilities with the aim of providing more opportunities for USC faculty and students to work at the forefront of biomedicine while continuing to provide outstanding patient care. It is not anticipated that an associated increase in student enrollment as a result of the Project would occur. Consequently, there would be no change in conditions that would prompt a change (i.e., neither an increase or decrease) in demand for student housing.

The Project's traffic analysis is presented in Section IV.C, Traffic Circulation and Parking, of the Draft EIR. The Project's traffic study was reviewed and commented on by the City's Department of Transportation (LADOT), the City department with jurisdiction over traffic and circulation issues. Please refer to Responses 3-1 and 3-3, which summarize LADOT's conclusions that the Project's traffic analysis adequately addressed the Project's potential transportation and circulation impacts.

COMMENT 9-4

EMPLOYMENT AND WORKFORCE:

In conversation with counselors at the Metro WorkSource Center, they have NOT been the recipient of increased requests for training or job opportunities relating to this Project. The WorkSource Center is underused by the University.

The surrounding area has few, if any, residents, directly involved with research.

Attachment B: Explanation of Checklist Determination

XIII. Public Services

C. Schools? Page B-29 reads as follows:

"Less than Significant Impact. The proposed educational and medical research office buildings and parking facilities on the Project Site are non-residential in nature and, therefore, would not directly generate school-age children. Though it is expected that most of the new employees would be drawn from the existing labor force in the area, the creation of new employment opportunities might induce new residents to the area. However, any potential new employees are expected to be distributed among the region's several municipalities and school districts and are not expected to contribute a significant number of children to any one school...."

We have heard that "doctors" are interested in buying into the area. If that is the case, then the surrounding community will have a Workforce population.

We refer to USC School of Policy, Planning and Development Professor Dowell Myers "2005 Summary Report on California Demographic Futures, Projections to 2030, by Immigrant Generations, Nativity, and Time Arrival in U.S." to emphasize the importance of incorporating our Latino, Chinese and other minority residents in to the Workforce.

urban.usc.edu/main_doc/downloads/california_demographics.pdf

To conclude, WE ARE CONCERNED ABOUT EMPLOYMENT OPPORTUNITIES NOT BEING AVAILABLE TO THE CURRENT RESIDENTS IN THE SURROUNDING COMMUNITIES and ONLY OPPORTUNITIES FOR HIGHLY-EDUCATED AND TRAINED PERSONNEL WILL BE AVAILABLE.

RESPONSE 9-4

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The Project aims to expand the academic and medical-related (e.g., medical research, medical clinic, etc.) facilities, which would prompt various employment opportunities for a range of skill levels. Examples of job opportunities that could arise from this type of expansion in medical and academic facilities range from additional janitorial staff to office support staff, medical professionals and additional researchers. In addition, and of particular note, is that Project development would also include opportunities for skill development; i.e., laboratory technician or other para-professional employment opportunities.

It is also important to note that the purpose of CEQA is to identify the potential impacts of the project on the physical environment. Economic and social impacts, pursuant to CEQA Guidelines Section 15131, need only be analyzed to the extent that there is an effect on the physical environment. Thus, issues raised in the comment regarding employment opportunities are purely economic in nature, and as such, are not within the purview of CEQA.

COMMENT 9-5

The Project is in the Eastside State Enterprise Zone. USC is [sic] participates in Small Business Incubators.

To conclude, WHERE ARE THE SMALL BUSINESS OPPORTUNITIES?

TAX BASIS, TAYPAYER BURDEN AND INFRASTRUCTURE:

Non-profits [sic] corporations dominate the research, academic and medical fields.

The following are in the current Health Sciences Campus area:

Los Angeles County–USC Medical Center Foundation
1200 N. State St.
Los Angeles, CA 90033

University of Southern California Kenneth Norris Jr. Cancer Center
1441 Eastlake Ave.
Los Angeles, CA 90033

USC Cardiothoracic Surgeons Inc.
1520 San Pablo St. #4300
Los Angeles, CA 90033

USC Care Medical Group Inc.
1510 San Pablo St. #649
Los Angeles, CA 90033

USC Family Mainline, Inc,
1420 San Pablo St. PMB B-205
Los Angeles, CA 90033

USC Health and Neck Group Inc.

1520 San Pablo St. #4600
Los Angeles, CA 90033

USC Internal Medicine Inc.
2020 Zonal Ave. IRD 620
Los Angeles, CA 90033

Society of Graduate Orthopedic Surgeons of LA County–USC Medical Center
1200 N. State St. #3900
Los Angeles, CA 90033

USC Neurologists Inc.
1510 San Pablo St.
Los Angeles, CA 90033

USC Neurosurgeons Inc.
1510 San Pablo St. #268
Los Angeles, CA 90033

USC Occupational Therapy Faculty Practice Inc.
1540 Alcazar, CHP 133
Los Angeles, CA 90033

USC Radiation Oncology Association, Inc.
1441 Eastlake Ave. G356
Los Angeles, CA 90033

USC Surgeons Inc.
1510 San Pale St. #514
Los Angeles, CA 90033

Los Angeles County USC Medical Center Auxiliary
1200 N. State St. #1900
Los Angeles, CA 90033

Money is expected to be made in this Industry. In the September 16, 1988 Los Angeles Times article "Caltech Joins Rush to Foster Biotech Spinoff Companies," they write:

"With visions of designer drugs and medical devices as the next mother lode in the technological revolution, California's universities are pushing the frontiers of biological research and making it

easier for their scientists to start up biotechnology companies. Caltech is the latest major research university to join in the gold rush, announcing on Tuesday an $18-million gift from businessman Eli Broad to expand biological research on campus and help spawn a "corridor" of biotech companies in Pasadena. Although Los Angeles-area universities have lagged behind their peers in spinning biological breakthroughs into biotech companies, Caltech President David Baltimore sees potential for a cluster of companies that will rival the spinoff ventures in the Bay Area, San Diego and Cambridge, Mass.

He envisions 'tens and maybe hundreds of small companies taking individual discoveries from Caltech and other institutions in the area and developing beneficial products.... We are just on the takeoff platform.'"

"USC is preparing to break ground on a $100-million biomedical research lab on campus that will turn raw scientific discoveries into useful products. UCLA hopes to establish a similar $100-million lab, provided that it can work out an arrangement with the same businessman who's bankrolling Northridge's biotech park and USC's lab: Alfred Mann."

USC is currently in the process of obtaining, as a fully-owned subsidiary the following company:

Health Research Association
1640 Marengo St.
Los Angeles, CA 90033

To conclude, DO SUBSIDIARIES GENERATE A TAX BASIS FOR A NON-PROFIT?

To conclude, WHERE IS THE CORPORATE AND PROPERTY TAX BASIS FOR SUCH A MONEY-MAKING ENDEAVOR? ARE PLACES LIKE PASADENA AND SAN DIEGO TO BE THE RECIPIENTS OF A TAX BASIS?

RESPONSE 9-5

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. As stated in Response 9-4, the purpose of CEQA is to identify the potential impacts of the project on the physical environment. Thus, issues raised in the comment regarding small business opportunities and other economic issues are not within the purview of CEQA. As the comment does not raise relevant issues for consideration in the Draft EIR under the California Environmental Quality Act (CEQA) and CEQA Guidelines, no further response is required.

COMMENT 9-6

To conclude, IS THE CURRENT PROPERTY TAX OWNER BEING EXPECTED TO FOOT THE BILL FOR BADLY NEEDED SEWER IMPROVEMENTS? PROPOSITION O WAS PASSED THIS YEAR PLACING THE BURDEN OF WATER QUALITY TO EACH PROPERTY OWNER.

To conclude, WILL THE RESIDENTS OF LOS ANGELES BE EXPECTED TO BE INDEBTED FOR MORE INFRASTRUCTURE BONDS?

RESPONSE 9-6

As discussed in the Draft EIR, Section IV.F.2, Wastewater, the existing sewer infrastructure is adequate to handle Project flows. Construction at the seven proposed Development Sites would require only the construction of lateral lines from the Development Sites to the sewer lines in the public right-of-way. These improvements would be the responsibility of the Applicant. The Project and related projects are not anticipated to cause a measurable increase in wastewater flows concurrent in time or at a point when a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained during peak service. Thus, no sewer improvements, other than those identified above, are required to implement the project as proposed.

COMMENT 9-7

I. Summary

11.6. Utilities and Service Systems, 6.1 Water, Page 39 reads as follows:

"Water Infrastructure

The water conveyance system serving the seven Development Sites includes water lines in Eastlake Avenue, San Pablo Street, Alcazar Street, Biggy Street and Zonal Avenue. An analysis was completed with regard to the ability of each of these lines to convey water to the site. As the analysis concludes that these water lines have sufficient capacity to convey the Project's maximum, Project impacts on the area's water conveyance system are less than significant."

To conclude, WITH THE GROWTH IN THE SURROUNDING AREAS, IS THIS STATEMENT TRULY ACCURATE IN THE NEAR FUTURE?

RESPONSE 9-7

As discussed in the Draft EIR, Section IV.F.1, Water Supply, cumulative impacts due to the development of projects in the surrounding area are situated such that the existing water

conveyance infrastructure is sufficient to support the identified related projects (see Section III.B. of the DEIR for a full list of related projects) and would not utilize the water mains utilized by the proposed Project. As such, no cumulative impacts would occur. In addition, sufficient capacity is available in the upstream water lines to accommodate the increase in water flows generated by related project development as well as development of the proposed Project. As such, cumulative impacts on the water lines that would serve the related projects and the proposed Project are less than significant.

Furthermore, as stated in the Draft EIR, the total estimated water demand for the Project at buildout is not anticipated to exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure), or exceed the projected employment, housing, or population growth projections of the applicable General Plan Framework and Community Plan, which are the documents upon which the planning for future water infrastructure needs are based. Furthermore, no local or regional upgrading of water conveyance systems is anticipated and, as such, no cumulative construction impacts from the development of additional off-site water lines are anticipated. Therefore, no significant unavoidable adverse impacts relative to the area's water conveyance system are anticipated to occur.

COMMENT 9-8

To conclude, ARE OUR FIRE DEPARTMENTS AND POLICE DEPARTMENTS STAFFED AT LEVELS TO HANDLE THE INCREASE OF PEOPLE, BUILDINGS AND SECURITY ISSUES?

RESPONSE 9-8

As stated in the Project's Initial Study, (see Appendix A of the Draft EIR, Attachment B, Section XIII, Public Services) the proposed Project does not pose significant impacts on Public Services, including the Police and Fire Departments. The Project Site is not located in a City of Los Angeles-designated high fire hazard area. The Los Angeles Fire Department (LAFD) provides fire protection to the Project Site. The nearest LAFD stations (Station 1 and Station 2) are both approximately one mile from the Project Site, and both stations feature two engine units and one rescue unit.[20] The Los Angeles Municipal Code (LAMC) Section 57.09.07 establishes a standard for maximum response distance from a LAFD Station based on land use, and the Project Site is within the LAMC response distance standard. Notwithstanding, all component structures of the Project, including any parking structures, would be constructed to include fire safety features such as sprinklers in accordance with LAMC requirements to ensure adequate fire protection. Furthermore, additional fire safety features would be identified through inspections in accordance with applicable standards and would identify any needs for additional measures to

[20] *http://www.lafd.org/vehicles.htm*

assure the adequate provision of fire protection services to the Project. As such, the Project would result in a less than significant impact related to the provision of fire protection, and no mitigation measures are necessary.

The Project's Initial Study also notes that the City of Los Angeles Police Department (LAPD) provides police protection to the Project Site and surrounding area, and the area's police station, the Hollenbeck Community Police Station, is located approximately 1.5 miles south of the Project Site. To minimize opportunities for criminal activity, thereby reducing the demands placed upon police services, Project buildings would be designed with security features, such as controlled access and illumination of public and semi-public spaces. In addition, USC maintains a Department of Public Safety to address safety and security concerns on its campuses. These existing services would be extended to include the proposed Project. Based on the above, any Project impacts on police protection services are anticipated to be less than significant, and no mitigation measures are necessary.

COMMENT 9-9

TRANSPORTATION, TRAFFIC AND ALTLERNATIVES [sic]:

No where [sic] mentioned in the report is the California High-Speed Rail. It is planned to go by Lincoln Park and Hazard Park and this Project.

http://www.cahighspeedrail.ca.gov/

To conclude, SINCE IT REQUIRES ELEVATED TO GROUND-LEVEL TRACKS, THERE IS SUBSTANTIAL IMPACT TO THIS AREA, IN LAND USE, NOISE, AIR QUALITY AND AESTHETICS.

RESPONSE 9-9

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The impacts identified in the comment are potential impacts not of Project but of the identified rail project. Furthermore, it is not anticipated that the potential impacts of the identified rail project would substantially contribute to the cumulative impacts of the proposed Project. As such, no further response is required.

COMMENT 9-10

Aspects of freeway infrastructure needs are not addressed properly. Again, the Workforce does not appear to be local, therefore it will require commuting from outlaying counties.

To conclude, WHAT IS THE AFFECT [sic] ON ALL THE FREEWAYS INTO THE AREA? WHERE ARE THE LOCAL STREET INFRASTRUCTURE IMPROVEMENTS?

Caltech plans a biomedical industry in its surrounding area. The Pasadena Freeway is old and dangerous.

To conclude, WHERE ARE THE STUDIES TO INDICATE INCREASED TRAFFIC FLOW TO THE AREA?

RESPONSE 9-10

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The potential traffic impacts of the proposed Project are analyzed in Section IV.C., Traffic Circulation and Parking, of the Draft EIR. The traffic analysis analyzed a total of 18 intersections in and around the USC HSC. These are the intersections that the Los Angeles Department of Transportation (LADOT) determined could be potentially impacted by the proposed Project. As such, LADOT also determined the following: (1) Project impacts on other intersections in the local area would be less than significant, and (2) that since Project traffic is anticipated to use the major and secondary highways adjacent to the HSC as well as internal streets within the campus, Project impacts on neighborhood streets would also be less than significant.

Mitigation Measures C-1 through C-18 (see pages 186-188) of the Draft EIR, identify the various mitigation measures the Project would implement to reduce and minimize impacts regarding traffic and parking on surrounding streets. In general terms, these mitigation measures include various specific measures such as signalizing certain intersections, widening and/or providing additional lanes, and re-striping turn lanes, intersections and roadways as needed.

The conclusions of the Project's intersection analysis are that with the implementation of the identified mitigation measures, the impacts of the proposed Project under Parking Scenario No. 1 during the A.M. and P.M. peak commuter hours would be reduced to less than significant levels for all but four locations. With regard to Parking Scenario No. 2, mitigation measures would reduce impacts to less than significant levels at all but three intersections.

Under Parking Scenario No. 1, no feasible mitigation measures are available to reduce the traffic impact to a less than significant level at the Soto Street and I-10 Freeway WB Ramps–Charlotte Street intersection (Intersection No. 16) during the P.M. peak commuter hour. Additionally, no feasible mitigation measures are available to reduce the traffic impacts to less than significant levels at the Mission Road and Griffin Avenue–Zonal Avenue intersection (Intersection No. 7) during the A.M. and P.M. peak commuter hours, and at the Mission Road and Daly Street-

Marengo Street intersection (Intersection No. 5) during the P.M. peak commuter hour. Since the City of Los Angeles and Caltrans have not formally approved the mitigation measure proposed for the Soto Street and Marengo Street intersection (Intersection No. 17), it is concluded that a significant and unavoidable impact would also occur at this intersection during both the A.M. and P.M. peak commuter hour. Under Parking Scenario No. 2 no feasible mitigation measures are available to reduce the traffic impact to a less than significant level at the Mission Road and Valley Boulevard intersection (Intersection No. 8) during the A.M. peak commuter hour, and at the Mission Road and Daly Street-Marengo Street intersection (Intersection No. 5) during the P.M. peak commuter hour. Similar to Parking Scenario No. 1, since the mitigation measure proposed for the Soto Street and Marengo Street intersection (Intersection No. 17) has not been formally approved, it is concluded that a significant and unavoidable impact would also occur at this intersection during both the A.M. and P.M. peak commuter hour.

If the mitigation measure proposed for the Soto Street and Marengo Street intersection is approved by the City of Los Angeles and Caltrans then the potentially significant project-related impact under Parking Scenario No. 1 and Parking Scenario No. 2 during both the A.M. and P.M. peak commuter hours would be reduced to a less than significant level. The mitigation for the Soto Street and Marengo Street intersection, which is elevated above the I-10 Freeway and is entirely on a bridge structure, consists of the removal of the raised median islands on Soto Street, north and south of Marengo Street, restriping the northbound and southbound approaches to provide dual left-turn lanes, two through lanes and one combination through/right-turn lane, as well as a traffic signal modification. The traffic signal installation may require a special foundation, given that the intersection is located entirely on a bridge structure. LADOT has conceptually approved this measure, pending review of detailed design (traffic and civil) plans. Construction of the measure would only occur during non-peak hours (between 9:00 A.M. and 3:00 P.M.) during weekdays. It is anticipated that removal of the raised median islands on Soto Street would require the temporary closure of the nearest southbound and northbound travel lanes and that the traffic signal modification would likely occur during the same timeframe. As these mid-day lane closures would not occur during either the A.M. or P.M. peak commuter travel periods and would be short-term in nature (i.e., one to two weeks), potential impacts are concluded to be less than significant.

If it is determined through the design process that a special foundation for the traffic signal poles cannot be installed without structural modification to the bridge, the construction of the measure would involve median removal, roadway restriping, a traffic signal modification and potentially the closure of some I-10 Freeway mainline travel lanes during the off-peak periods. It is anticipated that removal of the raised median islands on Soto Street would require the temporary closure of the nearest southbound and northbound travel lanes and that the traffic signal modification would likely occur during the same time frame. Whereas less than significant impacts, as described above, would result due to the construction of the Soto Street improvements, the bridge reconstruction would likely take several months to complete and

potentially require the closure of some mainline I-10 Freeway travel lanes during off-peak periods. Due to the duration of impacts to the I-10 Freeway, implementation of the proposed Soto Street/Marengo Street intersection improvements may result in a significant secondary impact.

The Project is treated as resulting in a significant impact at the Union Pacific Railroad (UPRR) at-grade crossing on San Pablo Street, immediately south of Valley Boulevard due to the existing intermittent adverse traffic conditions at this crossing. These impacts, however, would be temporary in nature (i.e., occurring approximately 12 times per day and lasting in duration between less than one and three_ minutes about half the time and occasionally lasting up to 18 minutes), and would be alleviated once San Pablo Street is available as a through traffic route. Absent either enforcement of a PUC ordinance that limits the duration that trains can block at-grade crossings or a relocation of the train stoppage to a point east or west of San Pablo Street, the impact of the Project relative to this railroad crossing would be potentially significant and unavoidable. Project impacts relative to the freeways in the area would be less than significant.

COMMENT 9-11

AIR QUALITY AND WATER QUALITY:

The surrounding communities because of its [sic] early role in Los Angeles history, has [sic] "grandfathered pollution" in the area. We have met a USC professor researching that subject.

To conclude, WHY IS THIS TYPE OF RESEARCH NOT INCLUDED IN THIS REPORT?

RESPONSE 9-11

The analysis of the Project's potential air quality impacts are presented in Section IV.D of the Draft EIR. This analysis was conducted in accordance with CARB and SCAQMD methodologies and significance thresholds. The analyses included the potential regional construction impacts, as well as localized construction impacts on air quality at each of 16 sensitive receptor locations, including nearby residential uses, the Women and Children's Hospital, Hazard and Lincoln Parks and the HSC Child Daycare Center. The potential impacts on air quality from Project operations were also analyzed at the local and regional level. Within an urban setting, vehicle exhaust is the primary source of CO, and the highest CO concentrations are generally found within close proximity to congested intersection locations. Consequently, the Project's air analysis looked at the projected traffic increase at various intersections and analyzed the potential for air quality impacts as result of an increase in traffic at these locations (see the Draft EIR, pages 218-221). The Draft EIR also analyzed potential impacts with regard to toxic air contaminant emissions and odors during construction and operation.

The mitigation measures identified in the Draft EIR set forth a program of air pollution control measures designed to reduce the proposed Project's air quality impacts to the extent feasible. Mitigation Measures D-1 through D-8 include requirements that general contractors shall implement a fugitive dust control program that meets all applicable provisions of SCAQMD Rule 403.[21] Other air quality mitigation measures include ensuring general contractors maintain and operate construction equipment so as to minimize exhaust emissions. Furthermore, during construction, trucks and vehicles would be prohibited from idling more than ten-minutes, and in loading and unloading queues would be required to turn their engines off, when not in use, to reduce vehicle emissions. Construction activities would be phased and scheduled to avoid emission peaks and discontinued during second-stage smog alerts, and heavy-duty construction equipment would use alternative clean fuels, such as low sulfur diesel or compressed natural gas with oxidation catalysts or particulate traps, to the extent feasible. Regional emissions[22] of nitrogen oxides and reactive organic compounds generated during Project construction, although reduced by the proposed mitigation measures, would remain at significant levels. Although the identified mitigation measures would also reduce emissions of particulate matter less than 10 microns in diameter, local air quality impacts[23] with regard to this one pollutant would be significant. During Project operations (i.e., after construction is completed), the proposed Project, after the implementation of the identified mitigation measures, would result in a significant impact with regard to regional emissions of nitrogen oxides. No significant impacts related to local air quality conditions during Project operations are forecasted to occur. Project development would be consistent with the SCAQMD's AQMP, and the City's General Plan Air Quality Element resulting in an impact that is less than significant. The proposed Project is not anticipated to include any notable TAC emissions sources. However, with compliance with SCAQMD Rule XIV (New Source Review of Air Toxics), any potentially significant TAC emission sources would be reduced to less than significant levels. Via compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines, potential impacts that could result due to potential odor source(s) would also be less than significant.

The Project's potential water quality impacts are analyzed in the Project's Initial Study (see Appendix A of the Draft EIR, Attachment B, Section VIII, Hydrology and Water Quality). This analysis concludes that Project development would have a less than significant impact with regard to all water quality issues via compliance with all applicable regulations (e.g., NPDES,

[21] *SCAQMD Rule 403 requirements are detailed in Appendix D of the Draft EIR.*

[22] *Regional emissions are those emissions that are analyzed in the context of the regional air mass that includes all of the South Coast Air Basin (i.e., the Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County.*

[23] *Local air quality impacts are those impacts that occur at specific locations in proximity to the Project Site and are shown in Figure 23 on page 202 of the Draft EIR.*

SUSMP and SWPPP). In fact, Project compliance with these regulations would actually improve water quality conditions in relation to those which presently occur as the existing development on this, or any other site, are not required to implement the measures that are currently applicable to nearly all new construction projects.

COMMENT 9-12

PARKS AND USC'S INFLUENCE:

The two parks mentioned in the report have been affected by the prospects of this Project—Lincoln Park and Hazard Park. The City has plans to connect the two parks. Safety and Department of Recreation and Parks staffing issues have not been addressed in this park. If the City did not connect the two parks, then the Project would play a relatively small role. This is not the case.

The historical aspects of Lincoln Park, formerly known as Eastlake Park and once a garden park, are neglected. The renown landscape architecture is voided by no Park Master Plan and recognition of Los Angeles' first suburb known as East Los Angeles. The surrounding walls are in dire need of repair.

Art Projects have been installed with taxpayer monies (federal, state and local) that benefit the medical research community and not the community residents i.e. The Wall – Las Memorias Project AIDS Monument at Lincoln Park.

The following is from a current Request-for-Proposal:

http://thewalllasmemorias.org/rfp.html

"Site Information

Lincoln Park, located at 3540 Mission Road in Lincoln Heights, Los Angeles, CA. A committee of community members selected Lincoln Park because of its rich history as a setting for monuments and for its name recognition in the Latino community. The park is also located near County USC Hospital which housed on [sic] of the largest HIV/AIDS medical centers in the United States. Over the past eleven years, Lincoln Park has been the site for the annual World AIDS Day event, Noche De Las Memorias (Night of Memories). The community has come to recognize the park as a venue for HIV/AIDS awareness and education."

A public park was used to promote the grant- and income-generating medical center without outreach to the community. Federal CDBG funding was used for the homeless for this project.

USC Institute for Genetic Medicine sponsors "D n A Digital and Art Curriculum Project" at Lincoln Park that encourages game curriculum for children. The area schools score low in test scores.

http://www.penelopetorribio.com/dnadigitalart.html

The USC Institute for Genetic Medicine was not affiliated with the USC Games Summit.

There are no studies in this report of Megan's Law Sex Offenders and the affect [sic] on public safety and its needs.

http://www.meganslaw.ca.gav/

RESPONSE 9-12

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The proposed Project does not propose any changes to Lincoln Park or Hazard Park and would not pose any significant impacts on either park either directly or indirectly. Furthermore, no aspect of the Project would preclude any activities that may be undertaken by the City or any other public agency to improve Lincoln and/or Hazard Parks. The Project's Initial Study also analyzed the potential impacts of the Project on area parks (see Appendix A of the Draft EIR, Attachment B, Section XIII, Public Services, and concluded that Project impacts are less than significant.

COMMENT 9-13

HOTELS:

This report indicates the potential building of one hotel; we have heard rumors of two hotels. There is no needs study included in this report with vacancy information from Downtown Los Angeles and Pasadena hotels. In comparison, UCLA's Guest House serves the needs of the entire university with a 61-room hotel.

http://www.hotels.ucla.edu/

Professors William Crookston and Christopher Harrer from the Marshall School of Business and Howard Krisvoy from USC's Business Expansion Network backed a small business project called Las Villas, Inc. in Lincoln Heights listed on the following:

RESPONSE 9-13

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The proposed Project does not include any hotel facilities and the Draft EIR only mentions hotels as a component of one of the Project's alternatives.

COMMENT 9-14

II. General Description of the Environmental Setting,

B. Cumulative Development

Table 1—List of Related Projects—UASC Health Sciences Campus, Page 71

"Map No. 10-3319 Broadway at Gates Street; Restaurant, 3,319 SF, Proposed"

This is more than a restaurant. It will serve beer and wine and has received a variance for a penny-arcade to accommodate 140 video machines. Translated, this means a gaming license can be awarded. The Community Redevelopment Agency, outside its jurisdiction but on the request of the Community Development Department, was in charge of this project as it received $1,500,000 in Federal HUD CDBG monies.

There was absolutely no consideration for the schools directly across the street, the churches and temples directly behind or across the street or the drug court down the street.

This has upset the Lincoln Heights Community as the raising of a family becomes less significant to the power of making money.

Are [sic] schools are failing and we are faced with a gaming license in a poverty census tract. The fact that this area is on the original Spanish land grants, give [sic] speculation that we are, in the future, in store for a casino.

We conclude, HOTELS IS [sic] NECESSARY IF THERE ARE OTHER VENTURES PLANNED FOR THE AREA SUCH AS A CASINO.

RESPONSE 9-14

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. Please refer to Response to Comment 9-13 regarding the absence of a hotel use in the Project's range of proposed uses.

COMMENT 9-15

LAND USE AND AESTHETICS:

In "Summary Of Environmental Impacts And Mitigation Measures, Land Use 8.1.A, it states:

"The creation of "pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide local identity" without increase in police and, safety."

We have a local identity already. We have a high crime rate, gang activity and drug trafficking. There are no studies or reports from the Hollenbeck Police Division.

RESPONSE 9-15

As stated in Section IV.A, Land Use, of the Draft EIR, the proposed Project would result in a less than significant land use impact because the interface of the proposed Project's physical and operational characteristics would be substantially compatible with the surrounding land uses; the Project would not result in the division, disruption or isolation of an existing established community or neighborhood; and the Project would be compatible with the applicable land use plans, policies and regulations.

As noted in Response 9-8 above and the Project's Initial Study (see Appendix A of the Draft EIR, Attachment B, Section XIII, Public Services) the Project would be designed in such a way to avoid or eliminate creating any increase in demand for police services and would result in a less than a significant impact on police services. The Project buildings would be designed with security features, such as controlled access and illumination of public and semi-public spaces. In addition, USC maintains a Department of Public Safety to address safety and security concerns on its campuses, and these existing services would be extended to include the proposed Project.

COMMENT 9-16

In the mitigation measures, Mitigation Measures [sic] B-3 states an HSC architectural design.

What is an HSC architectural design? Will it be modern in very old Victorian-design area? Will it make the surrounding community look small?

Art work and guidelines are not mentioned.

RESPONSE 9-16

Whereas the exact design of the new buildings have not been determined yet, the new construction will be guided by several design principles aimed at integrating the buildings into

the existing HSC. Specifically, the Draft EIR, Section II, Project Description, states that "the proposed buildings would be constructed of steel structural or concrete framework clad with pre-cast concrete panels and glass and aluminum curtain wall systems. Though the design of the proposed buildings has not been fully developed at this stage, their architectural style would be similar to the type of buildings that already exist on the HSC, such as those shown in the photographs in Figures 4 through 9 on pages 52 through 57 of the Draft EIR."

Section IV.B of the Draft EIR, Visual Resources, specifically notes the existing USC Health Sciences Campus buildings and the Los Angeles County – USC Medical Center, as constructed of high-quality architecture and that their architecture contributes to the aesthetic character of the area. The HSC is not generally visible from surrounding public streets (e.g., Soto Street, Valley Boulevard, and Mission Road) due to topography, as well as the presence of intervening structures and landscaping. The proposed structures, which can be characterized as infill development within an established campus, would not substantially alter, degrade or eliminate the existing visual character of the area. Architectural detailing would be compatible with existing structures within the existing HSC. Design features would also include the use of vertical sections of vegetation, crossing the structure's horizontal layers of concrete, to create the strong horizontal and vertical lines common in USC architecture.

Furthermore, the proposed density, height and bulk of the proposed structures would not substantially contrast with the visual character of the surrounding area, since the proposed structures would be consistent in scale with the existing HSC structures, and would not contrast with the features in the area that represent the area's valued aesthetic image. As such, construction of the proposed Project would create an aesthetic impact that is less than significant.

COMMENT 9-17

No mention is made of the floodplain and history. No mention is made of the LA River Revitalization Master Plan and its relationship to that plan.

RESPONSE 9-17

The Project's Initial Study (see Appendix A of the Draft EIR, Attachment B, Section VIII, Hydrology and Water Resources), addresses potential impacts regarding flooding and the Project's location in relation to a floodplain. The Project site is approximately 5 miles from the Los Angeles River, and there is no hydrologic connection between the Project site nor the Los Angeles River improvement efforts. Furthermore, the Project Site is not located within a 100-year flood plain. Therefore, the proposed structures would not impede or redirect flood flows within a 100-year flood hazard area. As no impact would occur with regard to flood plain issues, no mitigation measures are necessary.

COMMENT 9-18

COMMUNITY RELATIONS:

USC Community Relations Department has not built up a working relationship with the surrounding communities especially Lincoln Heights. We protested the installation of the AIDS monument to USC President Steven Sample. He forwarded [our complaint] to that department, who choose [sic] not to address the problem, but totally supported their employee holding the Community Relations position at the time.

Lincoln Heights is not represented in the Community Redevelopment Agency's Adelante Eastside Redevelopment Project Area Committee (PAC). The Lincoln Heights Neighborhood Council has jurisdiction in this Project.

The Council of Arroyo Seco Organizations (CASO) is creating an Arroyo Seco identity for the region: "The Arroyo Seco Greenway—Linking the Mountains to Downtown."

http://www.arroyoseco.org/caso.htm

We conclude, USC HAS NOT MADE ATTEMPTS TO INCORPORATE THEMSELVES [sic] INTO THE ENVIRONMENT AND DAILY LIVES OF THE REGION AND NEED [sic] FURTHER STUDIES BEFORE THE APPROVAL OF THIS SIGNIFICANT AND IMMENSE PROJECT.

RESPONSE 9-18

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. Although not addressing any environmental issues that are germane to CEQA, it is important to note that USC implements an extensive program regarding its role and participation in the community. Neighborhoods surrounding the HSC have been the focus of many community involvement efforts and four schools in the greater community have been formally adopted by USC through the USC HSC Partner Schools Task Force. The four schools adopted by USC are Griffin Avenue Elementary School, Murchison Street Elementary School, Sheridan Street Elementary School and Francisco Bravo Medical Magnet High School. These four schools collectively educate 4,900 children in total. Furthermore, this partnership has resulted in many USC affiliated initiatives designed to provide tutoring, mentoring, and health services to students, their families and communities. Two adult schools have also been included in the program, namely East Los Angeles Occupational Center and the East Los Angeles Skills Center.

Other USC HSC programs that assist the surrounding community include the USC Good Neighbors Campaign, in which faculty and staff of USC participate in an annual fundraising drive for USC Neighborhood Outreach, United Way and other organizations. The Medical Counseling, Organizing and Recruitment Program (Med-COR) provides tutoring services and mentorship to students in the 8^{th} -12^{th} grades. Another program, MESA (Mathematics Engineering Science Achievement) is offered statewide and provides opportunities to educationally disadvantaged middle and high school students. Furthermore, over 1,200 local minority business enterprises have been assisted since 1996 by the Los Angeles Metro Minority Business Development Center (MBDC), which is a core economic development program of USC.

USC is also actively involved with four neighborhood councils, three of which surround the HSC, specifically the Boyle Heights, Lincoln Heights and El Sereno Neighborhood Councils. USC also participates in three local chambers of commerce surrounding the HSC (i.e., Boyle Heights Chambers of Commerce, Lincoln Heights Chambers of Commerce and the Greater El Sereno Chamber of Commerce). Other community programs USC is involved in include the Diabetes Prevention and Education Program; the Folic Acid Fotonovela and Education Program; the Fuente Initiative, which enables USC students and local pharmacists to provide services such as screenings to improve knowledge of diseases; and the LAC+USC Violence Intervention Program Community Mental Health Center Mentoring and Tutoring Project which supports programs by USC students to aid victims of child abuse and neglect. Many other community programs exist, and in total over 250 community outreach programs are administered by USC and affiliated institutions. USC serves more than two million people a year through these programs, which range from the educational and health programs mentioned above, to sports and cultural arts programs, among others.

In addition, USC has presented the proposed Project in a number of public meetings before a number of governmental and civic organizations whose interests extend to the general area of the Project Site. In addition to the EIR public scoping meeting that was held on November 4, 2005, the following is a list of governmental and civic organizations that USC has addressed with regards to the proposed Project: Boyle Heights Neighborhood Council, Lincoln Heights Neighborhood Council, North Broadway Task Force, Lincoln Heights Chamber of Commerce and the Boyle Heights Chamber of Commerce.

LETTER NO. R1

Mistie Joyce, Environmental Specialist II
City of Los Angeles, Bureau of Sanitation
Citywide Recycling Division
433 South Spring St. 5th Floor
Los Angeles, CA 90013

COMMENT R1-1

Staff of the Bureau of Sanitation Citywide Recycling Division have [sic] read the Solid Waste Impact Analysis for the revised USC Health Sciences Campus Draft Environmental Impact Report, and have the following comments.

The Analysis states that construction debris would consist primarily of asphalt paving. Construction on undeveloped soil generally requires extensive excavation for building footings, which may generate significant amounts of soil which must removed from the site. However, like asphalt, beneficial uses can usually be found for this material (as top soil, clean fill, etc.), which would result in a negligible increase in disposed waste.

RESPONSE R1-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

COMMENT R1-2

The Analysis also states that, based on the average 2003 disposal rate, Los Angeles County would have inert disposal capacity for approximately 60 years. As the disposal rate is heavily dependent on such rapidly changing factors as population and the state of the economy, such a long-term forecast is not likely to be accurate.

RESPONSE R1-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. Solid waste would be generated during Project construction as well as on an annually recurring basis

once Project construction is complete and the buildings are occupied (i.e., Project buildout). Solid waste generated during Project construction would generally be disposed of at an inert landfill, in contrast to solid waste that is generated at Project buildout which would be disposed of at a municipal landfill (See Response R3-2). Based on data published by the County of Los Angeles Department of Public Works, annual quantities of materials disposed of at inert landfills over the last five years, which includes but is not limited to construction debris, has ranged from 1.2 to 1.6 million tons per year. Even if the annual disposal rate at inert landfills was to increase beyond levels experienced over the last five years, the Project's construction debris is conservatively forecasted to constitute 0.04 percent of the remaining capacity at the inert landfills currently serving Los Angeles County. As such, the conclusion of the Revised Draft EIR with regard to the Project's less than significant impact on inert landfill capacity remains valid.

COMMENT R1-3

In addition to the above comments, it should be noted that the Solid Waste Impact Analysis for this document was detailed and thorough to an unusual, and commendable, degree.

If you have any questions, please contact me at (213) 473-8233 or mjoyce@san.lacity.org

RESPONSE R1-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

LETTER NO. R2

Brian Wallace, Associate Regional Planner
Intergovernmental Review
SCAG
818 West Seventh Street
12th Floor
Los Angeles, CA 90017

COMMENT R2-1

Thank you for submitting the USC Health Sciences Campus Project for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the USC Health Sciences Campus Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's August 16-31, 2005 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1851. Thank you.

RESPONSE R2-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

LETTER NO. R3

Donald L. Wolfe, Director of Public Works
Carlos Ruiz, Assistant Division Director, Environmental Programs Division
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803-1331

COMMENT R3-1

Thank you for the opportunity to comment on the Revised Draft Environmental Impact Report for the USC Health Sciences Campus Project. The mitigation measures listed in the revised document include the recycling of construction and demolition debris to be generated and the inclusion of recycling bins to the project to address the issue of Solid Waste.

However, some statements in the Environmental Impact Report should be modified to address the following under Section a. Environmental Impacts of Solid Waste:

RESPONSE R3-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. This comment provides an introduction to the more specific comments raised in the balance of this letter. These comments are addressed below in Responses R3-2 through R3-4.

COMMENT R3-2

1. *Page 4, paragraph 3, states, "The disposal of solid waste generated within the City of Los Angeles, as well as throughout all of Los Angeles County, is under the jurisdictional responsibility of the County of Los Angeles, Department of Public Works."*

   We recommend revising this statement to clarify that providing disposal capacity is a shared responsibility of the County, the cities within Los Angeles County, County Sanitation Districts, private industry, and other stakeholders (see Los Angeles County Countywide Siting Element page 2-9 to 2-19). Also, the discussion should be expanded to indicate that currently, there is a shortage on daily in-County landfill disposal capacity. Over 7,000 tons per day of solid waste is being exported out of Los Angeles County. The solid waste generated by the proposed project will further strain the existing solid waste management and transportation infrastructure.

RESPONSE R3-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The requested revision with regard to the responsibility of providing disposal capacity has been incorporated into the Summary of Project Impacts as presented in Section I.G.6.c.(1) of this Final EIR.

Solid waste would be generated during Project construction as well as on an annually recurring basis once Project construction is complete and the buildings are occupied (i.e., Project buildout). Solid waste generated by the proposed Project at buildout would be disposed of at a municipal landfill, as opposed to solid waste generated during Project construction which would generally be disposed of at an inert landfill (See Response R1-2). Based on the maximum amount of proposed development (i.e., 765,000 square feet), the solid waste generated at Project buildout, that would be disposed of at a municipal landfill, would constitute 0.0018 percent of the 23.8 million tons of municipal solid waste generated in Los Angeles County in 2003 that is disposed of at municipal landfills, and 0.0015 percent of the 27.5 million tons of municipal solid waste forecasted to be generated in Los Angeles County in 2015 that would be disposed of at municipal landfills (i.e., the year of Project buildout). Based on a diversion rate of 50 percent for municipal solid waste and 7 percent for medical wastes, the actual amount of solid waste disposed of at a municipal landfill would be slightly more than half of that identified above. As such, Project development constitutes a very minor incremental impact relative to the County's annual solid waste disposal capacity at municipal landfills as well as impacts to Countywide transportation infrastructure.

COMMENT R3-3

2. *Page 4, paragraph 4, states, "The 2003 Annual Report (the most recent available report), clearly concludes that there is enough capacity within permitted solid waste facilities (i.e. landfills) to serve Los Angeles County through the 95-year planning period of 2003-2098."*

   This statement is incorrect. The Analysis in the subject Annual Report indicates that the existing disposal capacity within Los Angeles County is insufficient to meet the disposal needs of the County for the next 15 years. As mentioned above, over 7,000 tons per day of solid waste are currently being exported out of Los Angeles County. The Countywide Siting Element states the development of transformation facilities, increased recycling and other diversion efforts, and development of the infrastructure necessary to access out-of-County disposal facilities should be implemented for solid waste disposal services to remain uninterrupted (see the Los Angeles County Countywide Siting Element page 4-36).

   In addition, the Annual Report considers multiple scenarios for how the 15 year disposal capacity will be met. Several of these scenarios would require the exporting of 30,000 tons

per day of solid waste, adding more strain to the solid waste system and the transportation system.

RESPONSE R3-3

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. While the 2003 Annual Report includes the information cited in the comment, the 2003 Annual Report does conclude, as stated on page 20 of the Revised Draft EIR:

> "The 2003 Annual Report specifically states that "the County of Los Angeles will protect the health and safety of all residents in the County by ensuring that solid waste disposal service, an essential public service, is provided without interruption through the 15-year planning period and in the long term"."

Furthermore and as stated on page 21 of the Revised Draft EIR:

> "The Five-Year Review Report [for the Countywide Integrated Waste Management Plan, June 2004] states that the "remaining landfill capacity and the rate of depletion of that capacity give an indication of the ability of jurisdictions in the County to meet the solid waste disposal needs of their residents and businesses, thereby protecting public health and safety and the environment" (Five-Year Review Report, page 63). This report repeats the conclusion of the 2003 Annual Report that "the County continues to have adequate disposal capacity (i.e., greater than 15 years)" (Five-Year Review Report, page 65).

COMMENT R3-4

3. *Page 5, paragraph 2, states, "Solid waste generated during Project construction would be disposed of at landfills accepting inert materials..."*

   The document should be modified to indicate solid waste generated during project construction would be disposed of at inert landfills and municipal solid waste landfills. Inert landfills can only accept specific types of materials. However, construction projects also generate non-inert materials which can't be disposed of at inert landfills and must be disposed of at a municipal solid waste landfill.

RESPONSE R3-4

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The requested revision has been incorporated into the Summary of Project Impacts as presented in

Section I.G.6.c.(1) of this Final EIR. In addition, this information has been integrated into Correction and Addition No. IV.F-1.

COMMENT R3-5

If you have any questions, please contact Mr. George De La O, of this office, at (626) 458-5184, Monday through Thursday, 7 a.m. to 5:30 p.m.

RESPONSE R3-5

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project.

LETTER NO. R4

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

COMMENT R4-1

For the section, Environmental Impact Analysis-Solid Waste-Disposal Locations, Sunshine Canyon Landfill was mentioned as follows:

"Notwithstanding, as of January 2003, Sunshine Canyon Landfill received planning approval to operate a new, 55-million-ton capacity expansion within the City of Los Angeles. On May 13 2003, the California Integrated Waste Management Board approved a permit for the initial phase of the expansion project that increases the disposal area by 84 acres with a new capacity of 7.53 million tons."

This report dated in August, 2005 and mailed to recipients on August 18, 2005 fails to mention the following Los Angeles City Council motions that limit the Sunshine Canyon Landfill, CFI 05-1364 and CFI 05-1599.

CFI 05-1364 adopted on August 5, 2005 reads as follows:

"Landfilling is a wasteful and environmentally dangerous practice that results in the waste of resources that could be reused, recycled or converted back to beneficial use.

Cities and countries around the world are making a commitment to eliminate the need for landfilling by drafting and adopting "Zero Waste" policies that attempt to return every resource that is currently disposed of in landfills back to beneficial use.

This is a multi-pronged effort that includes maximizing and expanding current recycling, reuse and resource recovery programs, as well as converting biomass into green, renewable energy, alternative fuels, chemicals, or other feedstocks for manufacturing.

To demonstrate a commitment to a zero waste plan, the City must be visionary. The first and most essential step, (sic) is to mandate among ongoing reduction in the tons per day disposed of in landfills.

I THERFORE MOVE that the City Council mandate and Bureau of Sanitation implement a time-certain reduction in City Municipal Solid Waste (MSW) tonnage disposed at Sunshine Canyon Landfill accordingly:

YEAR TONS PER DAY DISPOSED

2005 3,600 (CURRENT)
2006 3,000
2007 2,000
2008 1,000
2009 500"

CFI 05-1599 adopted on August 5, 2005 reads as follows:

"The Director of Planning has erred in signing off as to the fulfillment of the [Q] conditions, necessary for BFI to commence landfilling operation in the City of Los Angeles.

The Director of Planning has willfully disregarded the advice of the Director of the City's Environmental Affairs Department as well as that of the Southern California Air Quality Management District with regard to the use of alternative fuel vehicles to be used for landfill operations at the Sunshine Canyon City side landfill. Specifically, the Director of Planning has deemed that gasoline is an alternative fuel.

As it is the City Attorney's opinion that the Council does not have the authority to overturn this decision, it is incumbent upon the Council to immediately establish a policy so as to permanently preclude the woeful disregard of community protections guaranteed by [Q]s in future proceedings.

Building and Safety, as the responsible enforcement agency, should be asked to look into whether or not their authority extends to the enforcement of this [Q] condition, for the purpose of providing a remedy.

I THERFORE MOVE that the Director of Planning immediately appear before the City Council to explain his decisions to disregard AQMD and EAD advice regarding the feasibility of gasoline as an alternative fuel, nullifying a [Q] condition necessary for the protection of the community surrounding the Sunshine Canyon Landfill from air pollution.

I FURTHER MOVE that [Q] conditions requiring the use of alternative fuel vehicles report to Council within 15 days as to any action available to them to maintain the integrity of the [Q] conditions requiring the use of alternative fuel vehicles at the Sunshine Canyon Landfill.

I FURTHER MOVE that if BFI is found to be non-compliant with [Q] conditions requiring the use of alternative fuel vehicles, that Building and Safety order an immediate "cease and desist" for landfilling operations for the Sunshine Canyon City-side landfill, until such time as BFI is determined to be in compliance.

I FURTHER MOVE that the City Attorney report to the PLUM committee within thirty days to suggest a policy by which the City Council can overturn the actions of the Planning Director if and when those actions disregard or ignore the adopted policy of the City Council with regard to [Q] conditions or other community protections."

RESPONSE R4-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The comment is directed towards actions of the City of Los Angeles rather than those applicable to the proposed Project. As such, no further response is needed.

COMMENT R4-2

Consequently, the section "Thresholds of Significance" implies that the Project would have significant impact "if" and lists two criteria.

This Project appears to meet those criteria for significance. "Zero Waste" policies and plans are outlined, in part, but not in relationship to this landfill reduction.

No mention is made for the use of alternative fuels and therefore, air quality is affected by the use of gasoline and diesel.

Solid waste would be significant over the course of the facilities lifetime and mitigation is necessary.

The University needs to keep current with environmental trends and demands of the City and its populace.

RESPONSE R4-2

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The analysis presented in Section IV.F.3 of the Revised Draft EIR analyzes the Project's potential impacts relative to the significance thresholds established therein. These significance thresholds reflect those that have been formally adopted by the City of Los Angeles. Project impacts with regard to all solid waste issues were concluded to be less than significant, with the exception of

Project impacts on solid waste disposal facilities during Project operation. Mitigation measures have been identified in the revised Draft EIR to address this potentially significant impact. With the imposition of the identified mitigation measures, all of the Project's solid waste impacts are reduced to less than significant levels. Therefore, no further mitigation measures are required or recommended.

LETTER NO. R5

Alexander M. Man, Chairman
Friends of Hazard Park and the Park Wetlands
4949 O'Sullivan Drive
Los Angeles, CA 90032

COMMENT R5-1

Friends of Hazard Park & The Park Wetlands has reviewed the Revised Draft E.I.R. referenced above. We are of the opinion the narrow, in-adequate focus of the mitigation measures proposed, along with omissions and errors, renders the revised D.E.I.R. in non-compliance with City and State CEQA guidelines for the following reasons

RESPONSE R5-1

The comment is noted and incorporated into the Final EIR for the review and consideration of the public and the decision makers prior to any approval action on the proposed Project. The Revised Draft EIR was prepared in accordance with City and State CEQA Guidelines. Specifically, the following is concluded with regard to the Revised Draft EIR: (1) the Revised Draft EIR disclosed the proposed Project's unavoidable and significant impacts and recommended all known feasible mitigation measures; (2) no new significant information as defined under CEQA Guidelines Section 15088.5(a) has been identified; and (3) the public has been given a meaningful opportunity to comment on these potential impacts.

This comment provides an introduction to more specific comments raised in the balance of this letter. These comments are addressed below in Responses R5-2 through R5-7.

COMMENT R5-2

OMISSION 1) PLAYGROUND STREET: HOUSE DEMOLITIONS: Several Playground Street houses bought by University of Southern California (USC) have been demolished. No mitigation measures have been provided for the degraded, demolished environment that will exist adjacent to the 14 remaining houses.

OMISSION 2) NO INFORMATION PROVIDED ON ANTICIPATED SOLID WASTE TONNAGE if remaining Playground Street houses are demolished incrementally during the 10 year construction of the 7 new Health Sciences units.

RESPONSE R5-2

The Project does not involve any changes to existing conditions found along Playground Street. As such, no further response is required.

COMMENT R5-3

OMISSION 3) NO SPECIFIC MITIGATION MEASURES IN REVISED DEIR to reduce solid trash truck conflict with traffic on local, collector and major streets and freeways , three of which are near the proposed USC facility, one of which is within a half mile of the project site.

RESPONSE R5-3

The trip generation rates used to calculate the Project's potential traffic impacts, as set forth in Section IV.C of the Draft EIR, includes the trips associated with all Project activities, including, but not limited to, trips generated by the trash collection trucks that would serve the Project Site. Therefore, the potential traffic impacts attributable to trash truck traffic have already been accounted for in the EIR's traffic analysis. All feasible traffic mitigation measures have been identified and recommended for incorporation into the Project. Furthermore, trash truck travel generally occurs during non-peak travel periods thereby further reducing potential traffic impacts by these types of trips. In addition, as the Project proposes development within the existing HSC, Project development would not require additional solid waste collection routes. Thus, as the Project would utilize established collection routes, Project implementation would not result in increased conflicts between traffic in the Project area and vehicles hauling solid waste.

COMMENT R5-4

OMISSION 4) NO SPECIFIC MITIGATION MEASURES PROVIDED in revised DEIR to reduce number of solid waste trips to dumps, such as use of recycled demolition materials, where feasible, in construction of the proposed 7 new Health Science buildings.

RESPONSE R5-4

Recycling requirements have been incorporated into Project construction as well as Project operations. As the amount of solid waste that would need to be disposed of at a landfill would be reduced via Project recycling programs, the number of trash truck trips required to dispose of the solid waste generated at the Project Site would also be reduced. These recycling requirements are set forth in Mitigation Measures F.3-1 through F.3-5 as well as the Applicant's commitment to implement a series of Project design features specifically targeting recycling (see Section IV.F.3.3.c of the Revised Draft EIR). All of these measures, whether they be Project design features or mitigation measures, would reduce the amount of solid waste generated at the Project Site that would be disposed of at landfills, which in turn, would reduce the number of trash truck trips required to serve the proposed Project. As a point of clarification, the Project proposes development on up to seven Development Sites, rather than the seven buildings referenced in the comment.

COMMENT R5-5

OMISSION 5) NO SPECIFIC MITIGATION MEASURES TO REDUCE DEMOLATION [sic] GENERATED DUST and diesel exaust [sic] from trucks and other heavy duty construction equipment on proposed project site and adjacent residential areas and public parks to to [sic] the south, north, east and west of the 22 acre construction site, during a 10 year long construction project.

RESPONSE R5-5

The comment pertains to air quality impacts during construction which are analyzed in Section IV.D - Air Quality of the Draft EIR. In that analysis, Mitigation Measures D-1 and D-2 require dust control measures and Mitigation Measures D-3 through D-7 set forth air pollution control strategies, including those targeting minimizing exhaust from diesel engines. Thus, all feasible mitigation measures with regard to construction dust and diesel exhaust have been incorporated into the Project.

COMMENT R5-6

OMISSION 6) NO INFORMATION PROVIDED ON NUMBER AND CUBIC YARD CAPACITY OF SOLID WASTE CARRYING TRUCKS to be used by waste haulers. TRAILERS PERMITTED? NUMBER OF MILES TO DUMPS AND METHODS USED TO SUPPRESS DUST BLOWING FROM TRUCKS IN TRANSIT TO DUMP SITES.

RESPONSE R5-6

The Applicant would continue to contract with private waste haulers to meet the Project's solid waste disposal requirements. The sizes of trucks deployed to the Project Site as well as the location of disposal are determined by the waste haulers themselves. While specific information regarding these specifics are not available at this time, the potential impacts of trash trip trucks have been incorporated into the Draft and Revised EIRs (i.e., traffic and air quality analyses which are based on factors that address all of the Project's trips, including those associated with trash disposal). Refer to Response R5-3 for additional information.

COMMENT R5-7

ERROR 7) DEIR IMPLIES THAT PARKING LOT ASPHALT IS ONLY RECYABLE [sic] MATERIAL TO BE PRODUCED BY DEMOLITION ON 22 ACRE CONSTRUCTION SITE. Factual credibility of revised DEIR severely diminished by that misrepresentation of fact.

RESPONSE R5-7

Information regarding the recycling of asphalt that would be removed during the Project's construction phase is based on the degree to which asphalt was recycled during construction and demolition activities of other projects recently undertaken by the Applicant. Recycling

throughout all phases of Project construction (i.e., in addition to asphalt recycling) would occur via implementation of Mitigation Measure F.3-2 which requires the Applicant to implement a demolition and construction debris recycling plan for all buildings constructed as part of the proposed Project.

Appendix A
Comment Letters

Appendix A-1
Comment Letters Received on Draft EIR

CRA/LA
Building communities with jobs & housing

Community Redevelopment Agency
of the CITY OF LOS ANGELES

Letter No. 1

DATE / June 27, 2005

FILE CODE /

354 South Spring Street / Suite 800
Los Angeles / California 90013-1268

T 213 977 1600 / F 213 977 1665
www.crala.org

Mr. Jimmy C. Liao, Project Coordinator
City of Los Angeles Department of City Planning
Room 750, City Hall
200 North Spring Street
Los Angeles, CA 90012

RE: USC Health Sciences Campus Project
Draft Environmental Impact Report
ENV-2004-1950-EIR
State Clearinghouse No. 2004101084

Dear Mr. Liao:

The Community Redevelopment Agency's ("Agency") Adelante Eastside Redevelopment Project staff appreciates the opportunity to review and comment on the Draft Environmental Impact Report for the proposed USC Health Sciences Campus Project. The draft EIR provides a substantive analysis of the effects of the proposed USC Health Sciences Campus Project including the various CEQA Guideline alternatives. 1-1

The following preliminary comments request clarification or additional information about the proposed project in relation to the Adelante Eastside Redevelopment Plan ("Plan").

- The proposed activity at development sites A, B, C, D and G is consistent with the Plan's designation of Open Space /Other Public/Quasi Public land use. However, the Plan identifies industrial use for development sites E and F. The proposed medical and institutional use will require that a discretionary approval be reviewed and granted by the Agency Board of Commissioners. Prior to Agency Board consideration of a requested discretionary action, the proposed USC Health Sciences Campus Project development program plans for Sites E and F must be reviewed and considered by the Adelante Eastside Redevelopment Project Area Committee (PAC). 1-2

- The Draft EIR anticipates the approval of entitlements from the City for the development of the proposed USC Health Sciences Campus Project. Section 521 Variances, Conditional Use Permits, Building Permits and Other Land Development Entitlements of the Adelante Eastside Redevelopment Plan states "*No zoning variance, conditional use permit, building permit, demolition or other land development entitlement shall be issued in the Project Area from the date of adoption of this Plan unless and until the application therefore has been reviewed by the Agency and determined to be in conformance with this Plan and any applicable design guidelines or development controls adopted by the Agency*". This means that the Agency will have the opportunity to review and comment on the requested entitlements prior to the City's Planning Commission taking action. 1-3

CRA/LA
Building communities with jobs & housing

- As indicated in the Draft EIR (page 62) and in accordance with Section 408.4 Development Plans of the Adelante Eastside Redevelopment Plan, all development plans within the redevelopment project area (whether public or private) shall be submitted to the Agency for approval and architectural review. **1-4**

- Page 83; under Section (3) Adelante Eastside Redevelopment Plan of the Draft EIR, second sentence implies that the Plan was adopted in 1979 and amended in 1999. The Plan was adopted by City Council under Ordinance No. 172514 on March 30, 1999, and has not to date been amended. **1-5**

We look forward to assisting you and the applicant with this important development. Please do not hesitate to contact me if you have any questions about this letter, or want to discuss scheduling briefings to the Adelante PAC. I can be reached at (213) 977-1685 or by email at rbocanegra@cra.lacity.org. **1-6**

Sincerely,

R. Bocanegra

Rodolfo Bocanegra
Project Planner
Adelante Eastside Redevelopment Project

cc: Jim Bickhart, CD14
File
Records

CITY OF LOS ANGELES
CALIFORNIA

Letter No. 2

SOLID RESOURCES CITYWIDE
RECYCLING DIVISION
433 S. SPRING STREET, SUITE 500
LOS ANGELES, CA 90013
TELEPHONE: (213) 473-8228
FACSIMILE: (213) 473-8232
E-MAIL: srord@san.lacity.org
WEBSITE: LARecycles.org

June 15, 2005

Mr. Jimmy C. Liao, Project Coordinator
Room 750, City Hall
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Dear Mr. Liao,

RE: REQUEST FOR COMMENTS ON A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT SCH 2004101084

Staff of the Bureau of Sanitation, Citywide Recycling Division have reviewed the above DEIR and have the following comments.

The Initial Study for this project, in Section XVI (f), concludes that the project may have a Potentially Significant Impact in the area of waste disposal capacity for the project in particular, and in Los Angeles County in general. The IS states "Therefore, this issue shall be further documented and analyzed in an Environmental Impact Report". In addition, a letter of comment on the Notice of Preparation for the project from the County of Los Angeles, Department of Public Works, states that: "The pre- during, and post- construction activities associated with the proposed project will increase the generation of solid waste and may have potentially significant impact to solid waste management infrastructure in the County. Therefore, the DEIR must identify what measures the City plans to implement to mitigate the impact." 2-1

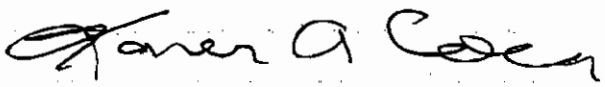
However, the DEIR does not mention solid waste generation or disposal. There is no discussion of the generation of solid waste during any phase of this project, nor of the impact which may be due to such generation, nor of any measure proposed to mitigate such impact.

In light of these omissions, the DEIR for this project or a supplement must be recirculated with the information, discussion, and proposed mitigations for the impact due to solid waste disposal. 2-2

Thank you for the opportunity to comment in this matter. If you have any questions or would like more information, please contact Mistie M Joyce at (213) 473-8233.

2-2 (Cont)

Sincerely,



Karen A. Coca, Environmental Officer
City of Los Angeles, Bureau of Sanitation
Solid Resources Citywide Recycling Division

Letter No. 3

FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

USC Health Sciences Campus
1510 - 1520 San Pablo St.
DOT Case No. CEN 04-1066/1750

Date: July 8, 2005

To: Jimmy C. Liao, Project Coordinator
Department of City Planning

From: Mike Bagheri, Transportation Engineer
Department of Transportation

Subject: **DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE PROPOSED UNIVERSITY OF SOUTHERN CALIFORNIA HEALTH SCIENCES CAMPUS PROJECT LOCATED IN EAST LOS ANGELES ENV-2004-1950-EIR**

The Department of Transportation (DOT) has reviewed the DEIR dated May 2005, prepared by the Los Angeles City Planning Department, and the supporting traffic study dated May 5, 2005, prepared by traffic consultant Linscott, Law & Greenspan, Engineers, for the proposed University of Southern California (USC) Health Sciences Campus (HSC) project located in East Los Angeles at 1510 San Pablo Street.

DOT has determined that the DEIR adequately responded to our attached comment letter, dated May 20, 2005, regarding the traffic study. As indicated in the DOT response letter, the traffic study analyzed eighteen intersections and determined that eleven of the intersections would be significantly impacted. Except as noted, the DEIR adequately evaluated the project-related traffic impacts on the surrounding community. 3-1

DISCUSSION AND FINDINGS

Project Description

The project consists of the construction of between approximately 585,000 gross square feet (GSF) (e.g., a maximum of 465,000 GSF of medical research facilities and a maximum of 120,000 GSF of medical clinic facilities) and 765,000 GSF of academic and medical-related research and office facilities (e.g., a maximum of 720,000 GSF of academic and medical research facilities and a maximum of 45,000 GSF of medical clinic facilities). Parking facilities will also be constructed for the future development within the existing USC HSC. The project sites currently contain surface parking lots, which would be removed, or are underdeveloped sites. Development would occur on up to seven sites designated as Sites A, B, C, D, E, F, and G. 3-2

Site	Location	Current	Proposed Maximum Development
A	Northside of Eastlake Avenue between San Pablo Street and roughly Biggy Street	Surface Parking Lot	Range from 120,000 GSF medical clinic facilities to 465,000 GSF academic and/or medical research facilities.
B	Southeast corner of San Pablo Street and Alcazar Street	Surface Parking Lot	Range from 120,000 GSF medical facilities to 295,000 GSF of academic and/or medical research facilities.
C	Northside of Zonal Avenue between State Street and Mission Street	Surface Parking Lot	Multi-story parking structure up to 2,800 parking spaces.
D	Northwest corner of Biggy Street and Zonal Avenue	Surface Parking Lot	Range from 59,000 GSF medical clinic facilities to 200,000 GSF academic and/or medical research facilities or up to 600 parking spaces.
E	Eastside of San Pablo Street between Valley Boulevard and Alcazar Street	Surface Parking Lot	Range from 118,000 GSF medical clinic facilities to 400,000 GSF academic and/or medical research facilities.
F	Westside of San Pablo Street between Valley Boulevard and Alcazar Street	Vacant	Range from 118,000 GSF medical clinic facilities to 400,000 GSF academic and/or medical research facilities.
G	South of Alcazar Street west of San Pablo Street	Underdeveloped	Range from 29,500 GSF medical clinic facilities to 100,000 GSF of academic and/or medical research facilities.

3-2 (Cont)

The study fully analyzed two scenarios for the provision of parking. Parking Scenario No. 1 analyzed transportation impacts if all project parking is located on the western side of the HSC at Site C (access to which would be provided via Zonal Avenue). Parking Scenario No. 2 analyzed transportation impacts if all projected parking is located on the northern side of the campus at Site E (access to which would be provided via San Pablo Street and Alcazar Street) and Site F (access to which would be provided via San Pablo Street). If

3-3

parking is proposed in any other combination, off-site impacts would be within the range identified under these two parking scenarios. The project is expected to be completed by year 2015. 3-3 (Cont)

The project will generate approximately 7,715 daily trips with 753 trips in the AM peak hour and 774 trips in the PM peak hour. 3-4

If you have any questions, please contact Eileen Hunt of my staff at (213) 972-8481.

P:\Letters\cen04-1066 USC HSC deir.wpd

Attachments

c: Jimmy Blackman, Council District No. 14
Martha Stephenson, Central District, DOT
Judy Wong, Design Division, DOT
Verej Janoyen, Signal Timing & Operations Division, DOT
Taimour Tanavoli, Citywide Planning Coordination Section, DOT
Edmond Yew, Land Development Group, BOE
Clare Look-Jaeger, Linscott, Law & Greenspan, Engineers

Department of Water and Power the City of Los Angeles

JAMES K. HAHN
Mayor

Commission
DOMINICK W. RUBALCAVA, *President*
SID C. STOLPER, *Vice president*
ANNIE E. CHO
GERARD McCALLUM II
SILVIA SAUCEDO
BARBARA E. MOSCHOS, *Secretary*

RONALD F. DEATON, *General Manager*

Letter No. 4

June 24, 2005

Mr. Jimmy C. Liao
Project Coordinator
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Liao:

Subject: USC Heath Sciences Campus Project
Comments on Draft Environmental Impact Report
California State Clearinghouse Number 2004101084

Thank you for providing the Los Angeles Department of Water and Power (LADWP) an opportunity to comment on your Draft Environmental Impact Report (EIR) for the proposed USC Health Sciences Campus Project, as requested in your letter dated May 26, 2005. LADWP does not have any comments at this time. For reference, the proposed project is located on seven development sites, totaling approximately 22 acres, within the existing USC Health Sciences Campus. Collectively, the sites lie to the northeast of the Los Angeles County-USC Medical Center (see Thomas Bros. Maps, page 635, A2, B2 and C2). **4-1**

The proposed project consists of the development of between 585,000 and 765,000 square feet of academic and medical research facilities as well as medical clinic facilities. The development sites currently contain surface parking lots and/or are undeveloped. Parking accommodations to support the proposed academic and medical-related uses are also included as part of this project.

As stated in the draft EIR, in compliance with California Water Code Sections 10910 – 10925 and satisfying the requirements of Senate Bill 610, a Water Supply Assessment (WSA) was prepared for the proposed project and was evaluated and adopted by the Board of Water and Power Commissioners (Board) on March 22, 2005 (Resolution Number 005 186). The Board also found that its projected available water supply during normal, single-dry, and multiple-dry years, as included in its Urban Watershed Management Plan (UWMP), could accommodate the projected water demand associated with the proposed project, and that LADWP could provide sufficient domestic water supplies to the proposed project. **4-2**

Please continue to include LADWP in your mailing list and address any correspondence to the undersigned in Room 1044. If there are any additional questions, please contact Ms. Sarah Easley Perez of my staff at (213) 367-1276. 4-3

Sincerely,

Charles C. Holloway
Supervisor of Environmental Assessment

SEP:gc
c: Ms. Sarah Easley Perez

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Sean Walsh
Director

Letter No. 5

July 12, 2005

Jimmy Liao
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: USC Health Sciences Campus Project
SCH#: 2004101084

Dear Jimmy Liao:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 11, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

5-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2004101084
Project Title USC Health Sciences Campus Project
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description The project is proposed to occur on seven development sites within the USC Health Science Campus (HSC). The seven development sites are identified as Development Sites A through G. The project consists of the development of between 585,000 and 765,000 SF of academic and medical research facilities as well as medical clinic facilities. The development sites currently contain surface parking lots and/or are underdeveloped. Parking accommodations to support the proposed academic and medical-related uses are also included as part of the project. The seven development sites comprise approximately 22 acres within the existing HSC. Actions requested by the applicant include: a General Plan Amendment from Public Facilities to General Commercial for Development Site C; a General Plan Amendment from Limited Industrial to General Commercial for Development Sites E and F; a Zone Change from PF to C2 for Development Site C; a Zone Change for the Development Sites to establish [Q] and/or [D] conditions; a Height District Change from IVL to 2 for Development Site D; a Zone Change from CM-1 to C2-2 for Development Sites E and F; a Variance from the distance requirement for parking to be provided within 750 feet of the proposed use; the abandonment of Henry Street through either a merger and resubdivision or a street vacation, and possible subdivision actions.

Lead Agency Contact

Name Jimmy Liao
Agency City of Los Angeles
Phone (213) 978-1331 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

5-2

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets Zonal Avenue / Biggy Street / San Pablo Street / Eastlake Avenue / Alcazar Street
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-10, I-5
Airports
Railways UPRR
Waterways
Schools Francisco Brave M.D. Magnet Senior HS
Land Use Vacant and/or surface parking / Zoning is PF (Public Facilities), CM (Commercial Manufacturing) and C2 (Commercial) / General Plan Designation is Public Facilities, Limited Industrial, and General Commercial.

Project Issues Aesthetic/Visual; Air Quality; Cumulative Effects; Growth Inducing; Landuse; Noise; Public Services; Schools/Universities; Sewer Capacity; Traffic/Circulation; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Department of Health Services; Office of Emergency Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report
State Clearinghouse Data Base

Date Received 05/26/2005 ***Start of Review*** 05/26/2005 ***End of Review*** 07/11/2005

5-2 (Cont)

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-3747
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

clear
7.11.05
e

IGR/CEQA No. 050577AL, DEIR & TS
Referenced to IGR/CEQA No. 041046AL
USC Health Sciences Campus Project
Vic. City Wide, LA-05/PM 18.78, LA-10/PM 19.07
SCH # 2004101084

July 5, 2005

Mr. Jimmy Liao
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Wolfe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to construct academic and medical research facilities and medical clinic facilities.

We would like to remind you that any work to be performed within the State Right-of-way will need an Encroachment Permit from the California Department of Transportation. 5-3

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water.

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project. Thank you for the opportunity to have reviewed this project.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 050577AL.

Sincerely,

Cheryl J. Powell

CHERYL J. POWELL
IGR/CEQA Branch Chief

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-3747
FAX: (213) 897-1337

Letter No. 6

Flex your power!
Be energy efficient!

IGR/CEQA No. 050577AL, DEIR & TS
Referenced to IGR/CEQA No. 041046AL
USC Health Sciences Campus Project
Vic. City Wide, LA-05/PM 18.78, LA-10/PM 19.07
SCH # 2004101084

July 5, 2005

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City of Los Angeles
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Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project. Thank you for the opportunity to have reviewed this project.

If you have any questions, please feel free to contact me at (213) 897-3747 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 050577AL.

Sincerely,

Cheryl J. Powell

CHERYL J. POWELL
IGR/CEQA Branch Chief

Letter No. 7

FRIENDS OF HAZARD PARK
And THE PARK WETLANDS
4949 O'Sullivan Drive
Los Angeles, CA 90032
Tel: (323) 225-4659 Fax: (310) 459-6398

July 11, 2005
FAX NO: (213)978-1343

Mr. Jimmy Liao
Room 750-Los Angeles City Hall
Department of City Planning
200 North Spring Street
Los Angeles, CA. 90012

RE:FRIENDS OF HAZARD PARK & PARK WETLANDS SUBMITS THE FOLLOWING COMMENTS ON ENVIRONMENTAL IMPACT REPORT ENV-2004-1950-EIR:

Friends of Hazard Park & Park Wetlands due to errors and omissions and vague, meaningles mitigation measures,believes the above referenced Draft Environmental Impact Report (DEIR) is not in compliance with the California Environmental Quality Act(CEQA), or the Los Angeles City Ceqa Guidelines , for the following reasons: 7-1

1)OMISSION: Water Resources, pages 275-340 of DEIR Water Resources sections of report omits any mention of possible ground water depletion to the Hazard Park Wetland that could occur during and after the seven (7) extensive excavations within the 22 acre construction project on the Health Sciences Campus of the University of Southern California.
FACT: The Hazard Park Wetland, which has been certified as a wetland by the U.S. Fish And Wildlife Service, is dependant on local ground water.Potential loss of the present ground water supply to the wetland,from the 7,large,deep building foundations(some of which may have connecting underground tunnels) could irreparably damage the Federally identified and endorsed wetland in Hazard Park. Federally identified wetlands are a protected environmental resource under United States environmental law. 7-2

2)ERROR:The DEIR does not contain any information on the biological resources in Hazard Park; having dismissed them in the Initial Study that was prepared for the Nov.4, 2004 meeting at the U.S.C. Medical School.Page B-7 states that Hazard.Park has the potential to contain notable biologigical resources.FACT:Enclosed Fish and Wildlife letter verifies the fact that it contains wildlife and native plants based upon their visit to the park on February 27,1997, typical of a wetland environment. 7-3

3)OMISSION - ERROR: Playground Street, a heavily used access street to Hazard Park is not listed on several local street listings in the DEIR,ENV-2004-1950.

FACT: The many athletic leagues and Lincoln Heights residents who use Hazard Park depend on Playground Street as their most convenient access to the park's recreation building , ball diamonds, soccer area and parking lot.There's no parking access from the Soto Street side of Hazard Park,which emphasizes the importance of continued access to Hazard Park's facilities for East Los Angeles residents and visiting athletic teams. QUESTION?- How does the future of Playground Street, a street of well maintained homes, of residents with modest incomes, many of whom have lived there for many years, fit into the expansion plans for the U.S.C. Health Sciences plan? 7-4

4) OMISSION:Page 12,DEIR:Neither the Environmental Assessment Form or the DEIR provide information, biological or numerical, on the number,type,size of trees to be removed at all of the Health Sciences building sites.
FACT: Existing trees have an important function in catching the particulates that 7-5

will be generated during the 10 year long construction program on the 22 acre's seven construction sites. Replacement trees referred to as mitigation measure will take 15-25 years to reach a level of maturity that will enable them to catch substantial amounts of particulates and absorb the carbon dioxide from the heavy construction equipment .Local residents will even lose the modest tree protection they now have. 7-5 (Cont)

Sincerely,

Alexander M. Man

Alexander M. Man
Chairman - Friends of Hazard Park & Park Wetlands
FAX NO: (310)459-6398
ANSWER PHONE (310)459-6398 OR (323)225-4659

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

March 11, 1997

Alexander M. Man
Chairman
FOCUS
P.O. Box 1711
Santa Monica, CA 90406

Re: Wetland in Hazard Park, City of Los Angeles, Los Angeles County, California

Dear Mr. Man:

This letter is in response to your written request, dated September 16, 1996 and received by the Service on December 13, 1996, to have the Fish and Wildlife Service (Service) evaluate a wetland within Hazard Park near the University of Southern California Medical Center in the City of Los Angeles, Los Angeles County, California. It is our understanding that your goal is to have the wetland within the recently abandoned railroad right-of-way owned by Southern Pacific Railroad restored and enhanced for biological, educational, and aesthetic purposes.

Gina Shultz of my staff met with you at the wetland site on February 27, 1997. The site is currently dominated by exotic species such as giant reed (*Arundo donax*), castor bean (*Ricinus communis*), acacia (*Acacia* sp.), eucalyptus (*Eucalyptus* spp.), palm tree, and pine tree. However, the site also supports native species such as mule fat (*Baccharis salicifolia*), willow (*Salix* sp.), and cattail (*Typha* sp.). A variety of birds, including but not limited to downy woodpecker (*Dendrocopos pubescens turati*), common yellowthroat (*Geothlypis trichas*), bushtit (*Psaltriparus minimus minimus*), Anna's hummingbird (*Calypte anna*), California towhee (*Pipilo crissalis*), scrub jay (*Aphelocoma coerulescens obscura*), northern mocking bird (*Mimus polyglottos polyglottos*), and American crow (*Corvus brachyrhynchos hesperis*), were detected on-site. The wetland is currently used by the adjacent Francisco Bravo Medical Magnet High School for the study of plants, animals, and water quality. The school would like to continue using it as an educational tool and has also expressed interest in participating in any future wetland restoration efforts. 7-6

Because wetland habitat is an essential and important habitat type, particularly as nesting and foraging habitat for migratory birds, and since more than 91 percent of the wetlands in California have been lost (Dahl 1990), it is the Service's goal to protect and restore this habitat. In addition, because wetlands are especially scarce and often degraded in urban areas, protection and

restoration of wetland habitat within our inner-cities is an important component of this overall goal. The Service therefore agrees that the wetland near Hazard Park is an important natural resource worthy of protection and has tremendous potential for enhancement and restoration. Even in its current condition it provides habitat for a variety of migratory birds. In addition to its enhancement potential through removal of exotic plants and revegetation with native riparian and fresh water marsh species, the site has potential for creation of additional wetlands through removal of fill below and adjacent to the railroad track and revegetation with native wetland plants. Any restoration or creation activities would have to be authorized by the property owner, Southern Pacific Railroad. The site also provides a wonderful opportunity to educate the students at Francisco Bravo Medical Magnet High School in the filed of science, including local biological resources.

7-6 (Cont)

We commend you in your efforts to protect and restore the wetland near Hazard Park for its biological, aesthetic, and educational value. We encourage you to submit any restoration plans to us for our comment. If there is anything we can do to further assist you, please do not hesitate to contact Ms. Shultz at (619) 431-9440.

Sincerely,

Gail C. Kobetich
Field Supervisor

Literature Cited

Dahl, T. E. 1990. Wetland losses in the United States 1780's to the 1980's. U.S. Fish and Wildlife Service, Washington D.C.

North East Trees

Letter No. 8

Monday July 11, 2005

Jimmy Liao, Lead planner
City of Los Angeles Planning Department
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: Draft Environmental Impact Review (DEIR)--- Health Services Campus (HSC)

Dear Mr. Liao:

It is with great pleasure that we correspond with you regarding the DEIR for USC's Health Sciences Campus. Recently, North East Trees mailed out stakeholder letters to the public agencies involved in the Hazard Creek Wetlands Project. As a result of those discussions, it came to our attention, that USC and the City of Los Angeles are proposing a change in use of several of the surface parking lots that are adjacent to Hazard Park's Wetland. We want to submit our comments to you, so that you become aware of our project, and include its hydrological resources in your study of environmental impacts on the proposed expansion of institutional uses and public facilities at USC's Health Sciences Campus. 8-1

The final EIR should include mention of Hazard Creek from Norfolk Street to Marengo Street. This creek was used as a rail line from the early 20th century, through the 1970's. In a report entitled, "Hazard Park Wetland: hydrology, biology, and conceptual restoration plan", prepared for the Los Angeles and San Gabriel Rivers Watershed Council in 1998, Dr. Edith Read, Manager of Biological Resources of Psomas Associates, documents the creek's history and classification:

> *Establishment of the rail structure caused normal flows to lose their meandering nature and run in a more linear pattern, but fortunately there is no evidence that the railroad construction significantly altered the width or hydrological capacity of the channel. Technically, Hazard Creek is an F6 (1) stream type in Valley Type 8, according to the Rosgen system of classification. This means the channel is highly entrenched, moderately sinuous, and the channel substrate is primarily clay and silt with occasional bedrock exposure, Channel gradient is less than 2%.* 8-2

North East Trees received design and planning funds to restore this creek. Discussions have been taking place since 1998 with the City of Los Angeles Department of Recreation and Parks, the Army Corps, the Los Angeles County Flood Control District, the Los Angeles Unified School District, City Council District 14, Assembly District 45, and University of Southern California. The project received letters of support from then-Councilman Antonio Villaraigosa for additional grant funds to build the stream improvements. To date, the Earth Island Institute has granted North East Trees $180,000, through the State Coastal Conservancy. The wetland is recognized by various governmental jurisdictions, and should be referenced in the final EIR.

The final EIR should discuss this project, as well as the hydrological conditions of the USC-owned parcels, which should document the historic creek. Storm water conveyance and ground water resources like the underground spring that feeds the creek should be mentioned. The final 8-3

570 W. Avenue 26, Suite 200, Los Angeles, California 90065 Phone: (323) 441-8634 Fax: (323) 441-8618

EIR should also address the increased levels of urban and storm run off based on the reduction of permeable surfaces and the increase in paved and developed surfaces. We would recommend that reclaimed water be considered on the USC properties, as a mitigation to reduce run off and other potential impacts on the soon to be naturalized creek/wetlands. Hydrological characteristics of the natural historic stream at Hazard Park including existing drainage patterns and those expected after the project, with alternatives and mitigations should be included in the final EIR. For example a parking lot could contain swales and cisterns to reduce runoff and encourage on site capture.

The Hazard Creek and Wetlands project can provide many health and open space and natural resource benefits to the immediate community and to employees and visitors to USC's Health Sciences Campus. Where there are currently homeless encampments, graffiti, and large bulky items dumped in the degraded streambed, the stream restoration is envisioned to repair the environment and provide a place for people to enjoy nature in the city. The City of Los Angeles Sanitation Bureau identifies Hazard Creek as a site for public funding from the Baykeeper lawsuit settlement, it has been recommended for Proposition 50 Chapter 8 water quality funding. There is also a strong potential for connecting a proposed path at the Hazard Creek/Wetlands Project with proposed paths on USC-owned property north of the park. 8-3 (Cont)

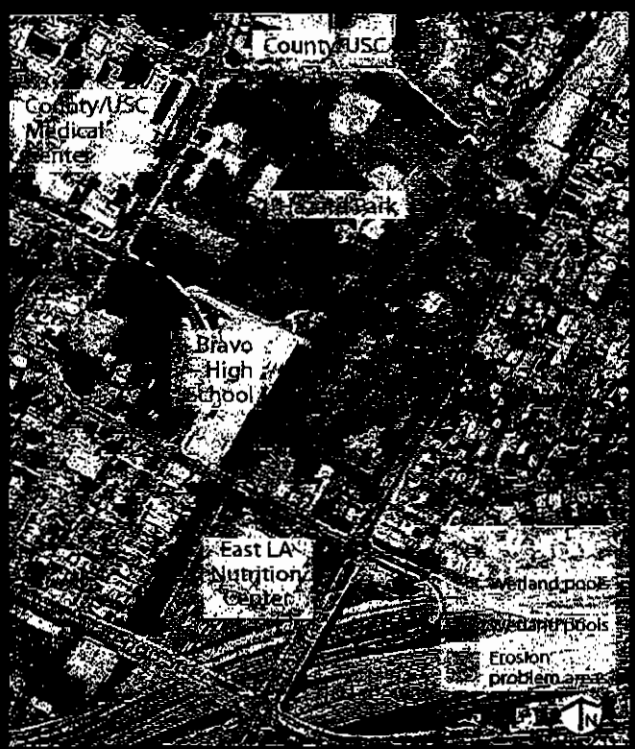
As our projects present so many wonderful opportunities to enhance public health and active recreation, while improving our natural resource conservation, we look forward to working closely with you to bring these efforts to the most successful conclusion possible.

Sincerely,

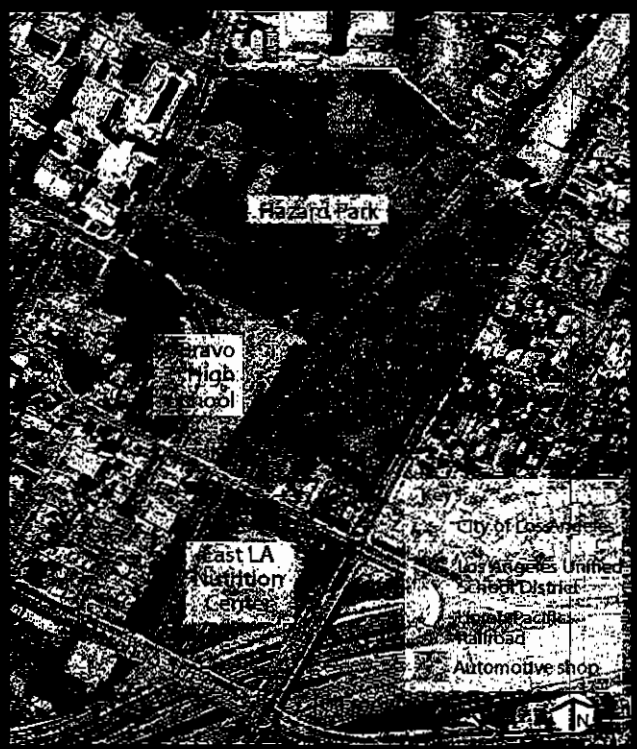
Larry Smith
Executive Director

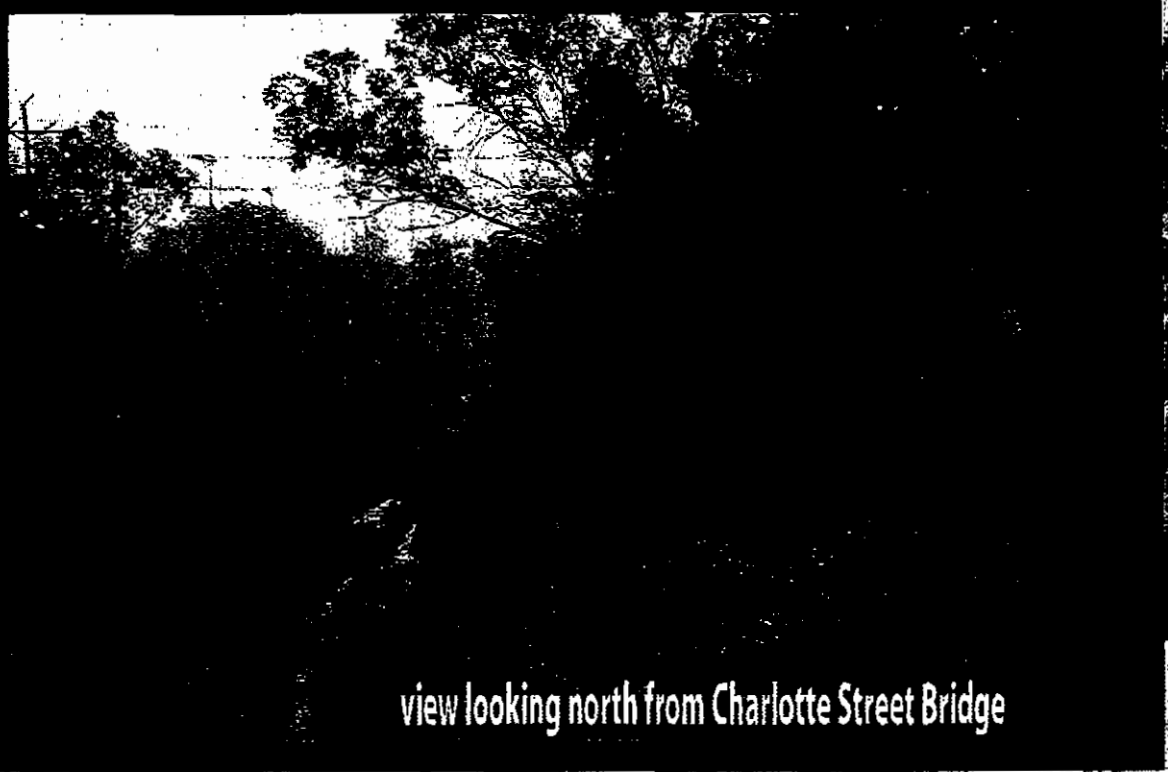
Hazard Park Stream Restoration Site maps

Site Map



Jurisdictions Map





view looking north from Charlotte Street Bridge

Hazard Park Stream Restoration

Concept Restoration Plan

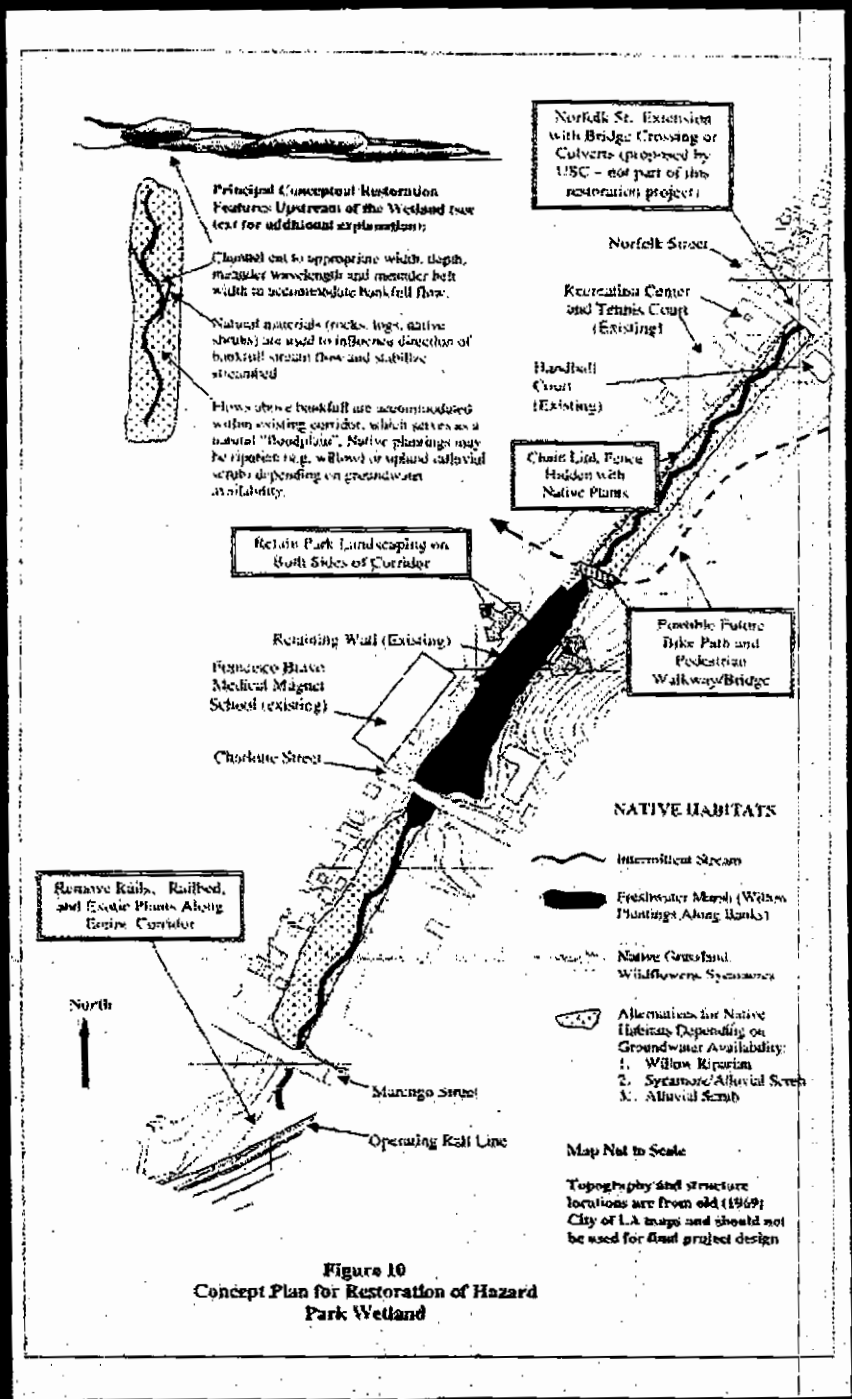


Figure 10
Concept Plan for Restoration of Hazard Park Wetland

From Hazard Park Wetland Restoration Plan
by Psomas Engineering, 1996

Letter No. 9

From: Joyce Dillard <dillardjoyce@yahoo.com>
To: Jimmy Liao <jliao@planning.lacity.org>
Date: 7/11/2005 3:36:51 PM
Subject: COMMENTS TO DRAFT EIR USC HEALTH SCIENCES CAMPUS PROJECT-ENV-2004-1950-EIR

COMMENTS TO DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
USC HEALTH SCIENCES CAMPUS PROJECT
ENV-2004-1950-EIR
STATE CLEARINGHOUSE NO. 2004101084

The document is insufficient in current need assessments and future need assessments for a project of this magnitude; and as such, should not be approved. **9-1**

Let us start with the obvious:

AVAILABILITY OF DRAFT EIR:

This document was accessible through the Internet on the City website:

http://cityplanning.lacity.org/

However, the City allowed no printing of any part of this document and the "Notice of Completion and Availability of Draft Environmental Impact Report No. ENV-2004-1950-EIR." We find this highly unusual for a Public Record to be restrictive to the Public. This is a substantially large EIR and Project estimated in the billions. **9-2**

We purchased a CD-ROM for $7.50 for better accessibility. Again, the City allowed no printing of any part of the document.

We asked for Volume II of the document a week before comment period. Only two copies were available at the Community Planning Department at Downtown City Hall. We were allowed to borrow a copy and photocopy the document itself.

Our computer availability access is limited due to time restrictions imposed on public-use computers.

The surrounding area is low-income and qualifies for Department of Housing and Urban Development (HUD) Community Development Block Grant Funds (CDBG) and is a State Enterprise Zone.

Copies were only available at the following libraries:

Central Library-Downtown LA
Malabar Branch Library-Boyle Heights
Benjamin Franklin Branch Library-Boyle Heights

Lincoln Heights Library-Lincoln Heights

As a courtesy due to a serious computer security problem, additional time for comments should be extended for this extensive EIR.

9-2 (Cont)

AREAS AFFECTED AND THE REAL ESTATE MARKET:

Regions affected by this project include more than the Northeast Los Angeles communities of Lincoln Heights, Boyle Heights and El Sereno. Employment and traffic from the Westside, Valley, San Bernardino County, Orange County, and Riverside County should affect this Project Area. Pasadena and the Arroyo Seco Region and especially Cal Tech will provide businesses and research projects that are "cousins" to this industry. All aspects of the environment will be affected.

This EIR clearly states that employment will be drawn from the surrounding area; and growth would be insignificant.

VI. Other Environmental Considerations.
B. Growth Inducing Impacts-Page 343 reads as follows:

"Although the proposed Project would constitute infill development within the existing HSC, which by its very nature has a lesser growth-inducing impact than development of undeveloped areas, the impacts of Project implementation would include effects on or from land use, visual resources, traffic and parking, air quality, and noise. The purpose of the proposed Project is to provide more opportunities for USC faculty and students to work at the forefront of their respective specialty while continuing to provide outstanding patient care. This intent is consistent with the land use goals of the City to revitalize this community and, as such, the Project Site has been designated under the City's General Plan Framework as a Commercial Center. While the proposed Project would not involve the construction of housing or generate a significant population increase resulting from new employees associated with the proposed Project, the proposed land uses, related facilities and the respective populations that directly utilize them represent an increment of direct on-site growth."

9-3

The Lincoln Heights community is currently undergoing a siege in real property. Residences are being inspected by the City's Department of Building and Safety (LADBS) for code violations. HUD's CDBG program supplies federal funding for a program called PACE-Pro-Active Code Enforcement, originally intended for slum landlords, but now used against homeowners. Other departments in LADBS are issuing Orders of Compliance-Commercial to residential owners, BUT they

fail to mail the order.

This constitutes the property as being "marked for market."

Those real estate "investors" who know real estate law, unfamiliar to the common man, like adverse possession, hostile possession and quiet title are in our local real estate market. They have taken advantage of elderly, ill homeowners or their heirs, including the heirs currently serving prison time, to "jump" title or quiet title these properties. "Wild" deeds are becoming common in a real estate market so undesirable that it took years on the market to sell a home.

Census Data and Household Income for the surrounding communities are as follows:

http://mcdc.missouri.edu/

Population Total:

Lincoln Heights 90031	38,716	
El Sereno 90032		46,837
Boyle Heights 90033		49,582
Total		135,135

Adult Population:

Lincoln Heights 90031	26,417	
El Sereno 90032		32,511
Boyle Heights 90033		31,664
Total		90,582

Household Income-Median:

Lincoln Heights 90031	$25,300	
El Sereno 90032		$33,445
Boyle Heights 90033		$22,429
Total		$27,058

Household Income-Average:

Lincoln Heights 90031	$37,022	
El Sereno 90032		$43,616
Boyle Heights 90033		$29,743
Total		$36,794

Vacant properties in the area have gone up in value from $67,320 assessed value (formerly $20,000-$40,000) to a $450,004 sales price.

9-3 (Cont)

From a March 20, 2005, Los Angeles Times article titled "Hotter than Beverly Hills 90210," is the following:

"On the other hand, neighborhoods where values were below the county median saw the greatest appreciation: Among the strongest performers were Lincoln Heights 90031, up 39.6%; El Monte 91731, up 30.6%; and Compton 90222, up 26.7%."

Homes have increased more than the 39.6% stated in this article. In actuality, they have risen in the hundreds of percent in the last few years.

These prices are not affordable to the communities in poverty that surround the area.

Poverty does afford developers tax credits and incentives to develop the area.

Lincoln Heights Historic Preservation Overlay Zone (HPOZ) was approved in the surrounding area without concern for the low-income property owners and renters including Senior Citizens. This added an extra expense to maintain small, old buildings; yet, it was perfectly designed for California Debt Limit Allocation Committee qualified developers to rehabilitate for a very low capital input of $8,500 per unit.

To conclude, ISSUES WERE ARE CONCERNED ABOUT GENTRIFICATION and GENTRIFICATION WITH USE OF FEDERAL FUNDS EARMARKED FOR POVERTY WITHOUT DIRECTLY AFFECTING THOSE IN POVERTY. HOW IS STUDENT HOUSING BEING ADDRESSED?

9-3 (Cont)

EMPLOYMENT AND WORKFORCE:

In conversation with counselors at the Metro WorkSource Center, they have NOT been the recipient of increased requests for training or job opportunities relating to this Project. The WorkSource Center is underused by the University.

The surrounding area has few, if any, residents, directly involved with research.

9-4

Attachment B: Explanation of Checklist Determination
XIII. Public Services
C. Schools? Page B-29 reads as follows"

"Less than Significant Impact. The proposed educational and medical research office buildings and parking facilities on the Project Site are non-residential in nature and, therefore, would not

directly generate school-age children. Though it is expected that most of the new employees would be drawn from the existing labor force in the area, the creation of new employment opportunities might induce new residents to the area. However, any potential new employees are expected to be distributed among the region's several municipalities and school districts and are not expected to contribute a significant number of children to any one school...."

We have heard that "doctors" are interested in buying into the area. If that is the case, then the surrounding community will have a Workforce population.

We refer to USC School of Policy, Planning and Development Professor Dowell Myers "2005 Summary Report on California Demographic Futures, Projections to 2030, by Immigrant Generations, Nativity, and Time Arrival in U.S." to emphasize the importance of incorporating our Latino, Chinese and other minority residents in to the Workforce.

urban.usc.edu/main_doc/downloads/
california_demographics.pdf

To conclude, WE ARE CONCERNED ABOUT EMPLOYMENT OPPORTUNITIES NOT BEING AVAILABLE TO THE CURRENT RESIDENTS IN THE SURROUNDING COMMUNITIES and ONLY OPPORTUNITIES FOR HIGHLY-EDUCATED AND TRAINED PERSONNEL WILL BE AVAILABLE.

9-4 (Cont)

The Project is in the Eastside State Enterprise Zone. USC is participates in Small Business Incubators.

To conclude, WHERE ARE THE SMALL BUSINESS OPPORTUNITIES?

TAX BASIS, TAYPAYER BURDEN AND INFRASTRUCTURE:

Non-profits corporations dominate the research, academic and medical fields.

The following are in the current Health Sciences Campus area:

9-5

Los Angeles County-USC Medical Center Foundation
1200 N. State St.
Los Angeles, CA 90033

University of Southern California Kenneth Norris Jr. Cancer Center
1441 Eastlake Ave.
Los Angeles, CA 90033

USC Cardiothoracic Surgeons Inc.

1520 San Pablo St. #4300
Los Angeles, CA 90033

USC Care Medical Group Inc.
1510 San Pablo St, #649
Los Angeles, CA 90033

USC Family Mainline, Inc.
1420 San Pablo St. PMB B-205
Los Angeles, CA 90033

USC Health and Neck Group Inc.
1520 San Pablo St. #4600
Los Angeles, CA 90033

USC Internal Medicine Inc.
2020 Zonal Ave. IRD 620
Los Angeles, CA 90033

Society of Graduate Orthopedic Surgeons of LA County-USC Medical Center
1200 N. State St. #3900
Los Angeles, CA 90033

USC Neurologists Inc.
1510 San Pablo St.
Los Angeles, CA 90033

USC Neurosurgeons Inc.
1510 San Pablo St. #268
Los Angeles, CA 90033

USC Occupational Therapy Faculty Practice Inc.
1540 Alcazar, CHP 133
Los Angeles, CA 90033

USC Radiation Oncology Association Inc.
1441 Eastlake Ave. G356
Los Angeles, CA 90033

USC Surgeons Inc.
1510 San Pale St. #514
Los Angeles, CA 90033

Los Angeles County USC Medical Center Auxiliary
1200 N. State St. #1900
Los Angeles, CA 90033

Money is expected to be made in this industry. In the September 16, 1988 Los Angeles Times article "Caltech Joins Rush to Foster Biotech Spinoff Companies," they write:

"With visions of designer drugs and medical devices as the next mother lode in the technological revolution, California's universities are pushing the frontiers of

9-5 (Cont)

biological research and making it easier for their scientists to start up biotechnology companies. Caltech is the latest major research university to join in the gold rush, announcing on Tuesday an $18-million gift from businessman Eli Broad to expand biological research on campus and help spawn a "corridor" of biotech companies in Pasadena. Although Los Angeles-area universities have lagged behind their peers in spinning biological breakthroughs into biotech companies, Caltech President David Baltimore sees potential for a cluster of companies that will rival the spinoff ventures in the Bay Area, San Diego and Cambridge, Mass.

He envisions 'tens and maybe hundreds of small companies taking individual discoveries from Caltech and other institutions in the area and developing beneficial products. . . . We are just on the takeoff platform.'"

"* USC is preparing to break ground on a $100-million biomedical research lab on campus that will turn raw scientific discoveries into useful products. UCLA hopes to establish a similar $100-million lab, provided that it can work out an arrangement with the same businessman who's bankrolling Northridge's biotech park and USC's lab: Alfred Mann."

9-5 (Cont)

USC is currently in the process of obtaining, as a fully-owned subsidiary the following company:

Health Research Association
1640 Marengo St.
Los Angeles, CA 90033

To conclude, DO SUBSIDIARIES GENERATE A TAX BASIS FOR A NON-PROFIT?

To conclude, WHERE IS THE CORPORATE AND PROPERTY TAX BASIS FOR SUCH A MONEY-MAKING ENDEAVOR? ARE PLACES LIKE PASADENA AND SAN DIEGO TO BE THE RECIPIENTS OF A TAX BASIS?

To conclude, IS THE CURRENT PROPERTY TAX OWNER BEING EXPECTED TO FOOT THE BILL FOR BADLY NEEDED SEWER IMPROVEMENTS? PROPOSITION O WAS PASSED THIS YEAR PLACING THE BURDEN OF WATER QUALITY TO EACH PROPERTY OWNER.

9-6

To conclude, WILL THE RESIDENTS OF LOS ANGELES BE EXPECTED TO BE INDEBTED FOR MORE INFRASTRUCTURE BONDS?

I. Summary
II.6. Utilities and Service Systems, 6.1 Water, Page 39 reads as follows:

9-7

"Water Infrastructure

The water conveyance system serving the seven Development Sites includes water lines in Eastlake Avenue, San Pablo Street, Alcazar Street, Biggy Street and Zonal Avenue. An analysis was completed with regard to the ability of each of these lines to convey water to the site. As the analysis concludes that these water lines have sufficient capacity to convey the Project's maximum, Project impacts on the area's water conveyance system are less than significant."

9-7 (Cont)

To conclude, WITH THE GROWTH IN THE SURROUNDING AREAS, IS THIS STATEMENT TRULY ACCURATE IN THE NEAR FUTURE?

To conclude, ARE OUR FIRE DEPARTMENTS AND POLICE DEPARTMENTS STAFFED AT LEVELS TO HANDLE THE INCREASE OF PEOPLE, BUILDINGS AND SECURITY ISSUES?

9-8

TRANSPORTATION, TRAFFIC AND ALTLERNATIVES:

No where mentioned in the report is the California High-Speed Rail. It is planned to go by Lincoln Park and Hazard Park and this Project.

http://www.cahighspeedrail.ca.gov/

9-9

To conclude, SINCE IT REQUIRES ELEVATED TO GROUND-LEVEL TRACKS, THERE IS SUBSTANTIAL IMPACT TO THIS AREA, IN LAND USE, NOISE, AIR QUALITY AND AESTHETICS.

Aspects of freeway infrastructure needs are not addressed properly. Again, the Workforce does not appear to be local, therefore it will require commuting from outlaying counties.

To conclude, WHAT IS THE AFFECT ON ALL THE FREEWAYS INTO THE AREA? WHERE ARE THE LOCAL STREET INFRASTRUCTURE IMPROVEMENTS?

Caltech plans a biomedical industry in its surrounding area. The Pasadena Freeway is old and dangerous.

9-10

To conclude, WHERE ARE THE STUDIES TO INDICATE INCREASED TRAFFIC FLOW TO THE AREA?

AIR QUALITY AND WATER QUALITY:

The surrounding communities because of its early role in Los Angeles history, has "grandfathered pollution" in the area. We have met a USC professor researching that subject.

9-11

To conclude, WHY IS THIS TYPE OF RESEARCH NOT INCLUDED IN THIS REPORT?

PARKS AND USC'S INFLUENCE:

The two parks mentioned in the report have been affected by the prospects of this Project-Lincoln Park and Hazard Park. The City has plans to connect the two parks. Safety and Department of Recreation and Parks staffing issues have not been addressed in this park. If the City did not connect the two parks, then the Project would play a relatively small role. This is not the case.

The historical aspects of Lincoln Park, formerly known as Eastlake Park and once a garden park, are neglected. The renown landscape architecture is voided by no Park Master Plan and recognition of Los Angeles' first suburb known as East Los Angeles. The surrounding walls are in dire need of repair.

Art Projects have been installed with taxpayer monies (federal, state and local) that benefit the medical research community and not the community residents i.e. The Wall-Las Memorias Project AIDS Monument at Lincoln Park.

The following is from a current Request-for-Proposal:

http://thewalllasmemorias.org/rfp.html

"Site Information
Lincoln Park, located at 3540 Mission Road in Lincoln Heights, Los Angeles, CA. A committee of community members selected Lincoln Park because of its rich history as a setting for monuments and for its name recognition in the Latino community. The park is also located near County USC Hospital which housed on of the largest HIV/AIDS medical centers in the United States. Over the past eleven years, Lincoln Park has been the site for the annual World AIDS Day event, Noche De Las Memorias (Night of Memories). The community has come to recognize the park as a venue for HIV/AIDS awareness and education."

9-12

A public park was used to promote the grant- and income-generating medical center without outreach to the community. Federal CDBG funding was used for the homeless for this project.

USC Institute for Genetic Medicine sponsors "D n A Digital and Art Curriculum Project" at Lincoln Park that encourages game curriculum for children. The area schools score low in test scores.

http://www.penelopetorribio.com/dnadigitalart.html

The USC Institute for Genetic Medicine was not

affiliated with the USC Games Summit.

There are no studies in this report of Megan's Law Sex Offenders and the affect on public safety and its needs.

http://www.meganslaw.ca.gov/

9-12 (Cont)

HOTELS:

This report indicates the potential building of one hotel; we have heard rumors of two hotels. There is no needs study included in this report with vacancy information from Downtown Los Angeles and Pasadena hotels. In comparison, UCLA's Guest House serves the needs of the entire university with a 61-room hotel.

http://www.hotels.ucla.edu/

9-13

Professors William Crookston and Christopher Harrer from the Marshall School of Business and Howard Krisvoy from USC's Business Expansion Network backed a small business project called Las Villas, Inc. in Lincoln Heights listed on the following:

II. General Description of the Environmental Setting,

B. Cumulative Development
Table 1- List of Related Projects-UASC Health Sciences Campus, Page 71

"Map No. 10-3319 Broadway at Gates Street; Restaurant, 3,319 SF, Proposed"

This is more than a restaurant. It will serve beer and wine and has received a variance for a penny-arcade to accommodate 140 video machines. Translated, this means a gaming license can be awarded. The Community Redevelopment Agency, outside its jurisdiction but on the request of the Community Development Department, was in charge of this project as it received $1,500,000 in Federal HUD CDBG monies.

9-14

There was absolutely no consideration for the schools directly across the street, the churches and temples directly behind or across the street or the drug court down the street.

This has upset the Lincoln Heights Community as the raising of a family becomes less significant to the power of making money.

Are schools are failing and we are faced with a gaming license in a poverty census tract. The fact that this area is on the original Spanish land grants, give speculation that we are, in the future, in store for a

casino.

We conclude, HOTELS IS NECESSARY IF THERE ARE OTHER VENTURES PLANNED FOR THE AREA SUCH AS A CASINO.

9-14 (Cont)

LAND USE AND AESTHETICS:

In "Summary Of Environmental Impacts And Mitigation Measures, Land Use 8.1.A, it states:

"The creation of "pedestrian –oriented, high activity, multi- and mixed-use centers that support and provide local identity" without increase in police and safety."

9-15

We have a local identity already. We have a high crime rate, gang activity and drug trafficking. There are no studies or reports from the Hollenbeck Police Division.

In the mitigation measures, Mitigation Measures B-3 states an HSC architectural design.

What is an HSC architectural design? Will it be modern in very old Victorian-design area? Will it make the surrounding community look small?

9-16

Art work and guidelines are not mentioned.

No mention is made of the floodplain and history. No mention is made of the LA River Revitalization Master Plan and its relationship to that plan.

9-17

COMMUNITY RELATIONS:

USC Community Relations Department has not built up a working relationship with the surrounding communities especially Lincoln Heights. We protested the installation of the AIDS monument to USC President Steven Sample. He forwarded to that department, who choose not to address the problem, but totally supported their employee holding the Community Relations position at the time.

Lincoln Heights is not represented in the Community Redevelopment Agency's Adelante Eastside Redevelopment Project Area Committee (PAC). The Lincoln Heights Neighborhood Council has jurisdiction in this Project.

9-18

The Council of Arroyo Seco Organizations (CASO) is creating an Arroyo Seco identity for the region: "The Arroyo Seco Greenway-Linking the Mountains to Downtown:"

http://www.arroyoseco.org/caso.htm

We conclude, USC HAS NOT MADE ATTEMPTS TO INCORPORATE THEMSELVES INTO THE ENVIRONMENT AND DAILY LIVES OF THE REGION AND NEED FURTHER STUDIES BEFORE THE APPROVAL OF THIS SIGNIFICANT AND IMMENSE PROJECT.

9-18 (Cont)

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Appendix A-2
Comment Letters Received on Revised Draft EIR

Letter No. R1

From: Mistie Joyce [MJoyce@SAN.LACITY.ORG]
Sent: Thursday, October 06, 2005 3:08 PM
To: Patricia Diefenderfer
Cc: Bruce Lackow; Deborah Cluff; Joe Maturino; Karen Coca
Subject: Comments: USC HSC DEIR

City of Los Angeles, Department of City Planning Ms. Patricia Diefenderfer, City Planner

Dear Ms. Diefenderfer,

RE: UNIVERSITY OF SOUTHERN CALIFORNIA HEALTH SCIENCES CAMPUS PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Staff of the Bureau of Sanitation Citywide Recycling Division have read the Solid Waste Impact Analysis for the revised USC Health Sciences Campus Draft Environmental Impact Report, and have the following comments.

The Analysis states that construction debris would consist primarily of asphalt paving. Construction on undeveloped soil generally requires extensive excavation for building footings, which may generate significant amounts of soil which must removed from the site. However, like asphalt, beneficial uses can usually be found for this material (as top soil, clean fill, etc.), which would result in a negligible increase in disposed waste. **R1-1**

The Analysis also states that, based on the average 2003 disposal rate, Los Angeles County would have inert disposal capacity for approximately 60 years. As the disposal rate is heavily dependent on such rapidly changing factors as population and the state of the economy, such a long-term forecast is not likely to be accurate. **R1-2**

In addition to the above comments, it should be noted that the Solid Waste Impact Analysis for this document was detailed and thorough to an unusual, and commendable, degree. **R1-3**

If you have any questions, please contact me at (213) 473-8233 or mjoyce@san.lacity.org

Mistie M Joyce, Environmental Specialist II Bureau of Sanitation, Citywide Recycling Division
(213) 473-8233
mjoyce@san.lacity.org

Letter No. R2

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800
f (213) 236-1825

www.scag.ca.gov

September 12, 2005

Ms. Patricia Diefenderfer, Project Coordinator
Room 667, City Hall
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20050544 USC Health Sciences Campus Project

Dear Ms. Diefenderfer:

Thank you for submitting the **USC Health Sciences Campus Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. **R2-1**

We have reviewed the **USC Health Sciences Campus Project,** and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **August 16-31, 2005** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1851. Thank you.

Sincerely,

BRIAN WALLACE
Associate Regional Planner
Intergovernmental Review

Doc #113800

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.org

DONALD L. WOLFE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

Letter No. R3

IN REPLY PLEASE
REFER TO FILE: EP-2

October 5, 2005

Ms. Patricia Diefenderfer
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 667
Los Angeles, CA 90012-3243

Dear Ms. Diefenderfer:

REVISED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT ENV-2004-1950-EIR

Thank you for the opportunity to comment on the Revised Draft Environmental Impact Report for the USC Health Sciences Campus Project. The mitigation measures listed in the revised document include the recycling of construction and demolition debris to be generated and the inclusion of recycling bins to the project to address the issue of solid waste. **R3-1**

However, some statements in the Environmental Impact Report should be modified to address the following under Section a. Environmental Impacts of Solid Waste:

1. *Page 4, paragraph 3, states, "The disposal of solid waste generated within the City of Los Angeles, as well as throughout all of Los Angeles County, is under the jurisdictional responsibility of the County of Los Angeles, Department of Public Works."*

   We recommend revising this statement to clarify that providing disposal capacity is a shared responsibility of the County, the cities within Los Angeles County, County Sanitation Districts, private industry, and other stakeholders (see Los Angeles County Countywide Siting Element page 2-9 to 2-19). Also, the discussion should be expanded to indicate that currently, there is a shortage on daily in-County landfill disposal capacity. Over 7,000 tons per day of solid waste is being exported out of Los Angeles County. The solid waste generated by the proposed project will further strain the existing solid waste management and transportation infrastructure. **R3-2**

2. *Page 4, paragraph 4, states, "The 2003 Annual Report (the most recent available report), clearly concludes that there is enough capacity within permitted solid waste facilities (i.e. landfills) to serve Los Angeles County through the 15-year planning period of 2003-2018."*

This statement is incorrect. The Analysis in the subject Annual Report indicates that the existing disposal capacity within Los Angeles County is insufficient to meet the disposal needs of the County for the next 15 years. As mentioned above, over 7,000 tons per day of solid waste are currently being exported out of Los Angeles County. The Countywide Siting Element states the development of transformation facilities, increased recycling and other diversion efforts, and development of the infrastructure necessary to access out-of-County disposal facilities should be implemented for solid waste disposal services to remain uninterrupted (see the Los Angeles County Countywide Siting Element page 4-36). **R3-3**

In addition, the Annual Report considers multiple scenarios for how the 15 year disposal capacity will be met. Several of these scenarios would require the exporting of 30,000 tons per day of solid waste, adding more strain to the solid waste system and the transportation system.

3. *Page 5, paragraph 2, states, "Solid waste generated during Project construction would be disposed of at landfills accepting inert materials..."*

The document should be modified to indicate solid waste generated during project construction would be disposed of at inert landfills and municipal solid waste landfills. Inert landfills can only accept specific types of materials. However, construction projects also generate non-inert materials which can't be disposed of at inert landfills and must be disposed of at a municipal solid waste landfill. **R3-4**

If you have any questions, please contact Mr. George De La O, of this office, at (626) 458-5184, Monday through Thursday, 7 a.m. to 5:30 p.m. R3-5

Very truly yours,

DONALD L. WOLFE
Director of Public Works

CARLOS RUIZ
Assistant Division Engineer
Environmental Programs Division

GO:sm
P:\Sec\USC HSC

Letter No. R4

From: Joyce Dillard [dillardjoyce@yahoo.com]
Sent: Saturday, October 01, 2005 12:01 PM
To: Patricia Diefenderfer
Subject: ADDITIONAL COMMENTSUSC HEALTH SCIENCES CAMPUS PROJECT REVISED DRAFT EIR ENV-2004-1950-EIR

COMMENTS—USC HEALTH SCIENCES CAMPUS PROJECT REVISED DRAFT EIR
ENV-2004-1950-EIR Due October 3, 2005

For the section, Environmental Impact Analysis-Solid Waste-Disposal Locations, Sunshine Canyon Landfill was mentioned as follows: **R4-1**

"Notwithstanding, as of January 2003, Sunshine Canyon Landfill received planning approval to operate a new, 55-million-ton capacity expansion within the City of Los Angeles. On May 13 2003, the California Integrated Waste Management Board approved a permit for the initial phase of the expansion project that increases the disposal area by 84 acres with a new capacity of 7.53 million tons."

This report dated in August, 2005 and mailed to recipients on August 18, 2005 fails to mention the following Los Angeles City Council motions that limit the Sunshine Canyon Landfill, CFI 05-1364 and CFI 05-1599.

CFI 05-1364 adopted on August 5, 2005 reads as follows:

"Landfilling is a wasteful and environmentally dangerous practice that results in the waste of resources that could be reused, recycled or converted back to beneficial use.

Cities and countries around the world are making a commitment to eliminate the need for landfilling by drafting and adopting "Zero Waste" policies that attempt to return every resource that is currently disposed of in landfills back to beneficial use.

This is a multi-pronged effort that includes maximizing and expanding current recycling, reuse and resource recovery programs, as well as converting biomass into green, renewable energy, alternative fuels, chemicals, or other feedstocks for manufacturing.

To demonstrate a commitment to a zero waste plan, the City must be visionary. The first and most essential step, (sic) is to mandate among ongoing reduction in the tons per day disposed of in landfills.

I THERFORE MOVE that the City Council mandate and Bureau of Sanitation implement a time-certain reduction in City Municipal Solid Waste (MSW) tonnage disposed at Sunshine Canyon Landfill accordingly:

YEAR TONS PER DAY DISPOSED

2005 3,600 (CURRENT)
2006 3,000

2007 2,000
2008 1,000
2009 500"

R4-1 Cont'd

CFI 05-1599 adopted on August 5, 2005 reads as follows:

"The Director of Planning has erred in signing off as to the fulfillment of the [Q] conditions, necessary for BFI to commence landfilling operation in the City of Los Angeles.

The Director of Planning has willfully disregarded the advice of the Director of the City's Environmental Affairs Department as well as that of the Southern California Air Quality Management District with regard to the use of alternative fuel vehicles to be used for landfill operations at the Sunshine Canyon City side landfill. Specifically, the Director of Planning has deemed that gasoline is an alternative fuel.

As it is the City Attorney's opinion that the Council does not have the authority to overturn this decision, it is incumbent upon the Council to immediately establish a policy so as to permanently preclude the woeful disregard of community protections guaranteed by [Q] s in future proceedings.

Building and Safety, as the responsible enforcement agency, should be asked to look into whether or not their authority extends to the enforcement of this [Q] condition, for the purpose of providing a remedy.

I THERFORE MOVE that the Director of Planning immediately appear before the City Council to explain his decisions to disregard AQMD and EAD advice regarding the feasibility of gasoline as an alternative fuel, nullifying a [Q] condition necessary for the protection of the community surrounding the Sunshine Canyon Landfill from air pollution.

I FURTHER MOVE that [Q] conditions requiring the use of alternative fuel vehicles report to Council within
15 days as to any action available to them to maintain the integrity of the [Q] conditions requiring the use of alternative fuel vehicles at the Sunshine Canyon Landfill.

I FURTHER MOVE that if BFI is found to be non-compliant with [Q] conditions requiring the use of alternative fuel vehicles, that Building and Safety order an immediate "cease and desist" for landfilling operations for the Sunshine Canyon City-side landfill, until such time as BFI is determined to be in compliance.

I FURTHER MOVE that the City Attorney report to the PLUM committee within thirty days to suggest a policy by which the City Council can overturn the actions of the Planning Director if and when those actions disregard or ignore the adopted policy of the City Council with regard to [Q] conditions or other community protections."

Consequently, the section "Thresholds of Significance" implies that the Project would have significant impact "if" and lists two criteria.

R4-2

This Project appears to meet those criteria for significance. "Zero Waste" policies and plans are outlined, in part, but not in relationship to this landfill reduction. R4-2 Cont'd

No mention is made for the use of alternative fuels and therefore, air quality is affected by the use of gasoline and diesel.

Solid waste would be significant over the course of the facilities lifetime and mitigation is necessary.

The University needs to keep current with environmental trends and demands of the City and its populace.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

FRIENDS OF HAZARD PARK AND THE PARK WETLANDS
4949 O'Sullivan Drive
Los Angeles, CA 90032
Phone: (323)225-4659 Fax: (310)459-6398
Email: skylarknla@yahoo.com

Letter No. R5

October 1,2005

Patricia Diefenderfer
Project Coordinator - USC Health Sciences Campus Project
Room 667, City Hall
200 North Spring Street
Los Angeles,CA. 90012

FAX NO:(213)978-1477

RE:SUBMISSION OF COMMENTS ON "REVISED DRAFT ENVIRONMENTAL IMPACT REPORT" ENV-2004-1950-EIR,BY FRIENDS OF HAZARD PARK & PARK WETLANDS.

Friends of Hazard Park & The Park Wetlands has reviewed the Revised Draft E.I.R. referenced above.We are of the opinion the narrow, inadequate focus of the mitigation measures proposed, along with omissions and errors,renders the revised D.E.I.R. in non-compliance with City and State CEQA guidelines for the following reasons: R5-1

OMISSION 1)PLAYGROUND STREET HOUSE DEMOLITIONS:Several Playground Street houses bought by University of Southern California(USC)have been demolished. No mitigation measures have been provided for the degraded,demolished environment that will exist adjacent to the 14 remaining houses.

OMISSION 2)NO INFORMATION PROVIDED ON ANTICIPATED SOLID WASTE TONNAGE if remaining 14 Playground Street houses are demolished incrementally during the 10 year construction of the 7 new Health Sciences units. R5-2

OMISSION 3)NO SPECIFIC MITIGATION MEASURES IN REVISED DEIR to reduce solid trash truck conflict with traffic on local,collector and major streets and freeways, three of which are near the proposed USC facility,one of which is within a half mile of the project site. R5-3

OMISSION 4)NO SPECIFIC MITIGATION MEASURES PROVIDED in revised DEIR to reduce number of solid waste trips to dumps,such as use of recycled demolition materials,where feasible,in construction of the proposed 7 new Health Science buildings. R5-4

OMISSION 5)NO SPECIFIC MITIGATION MEASURES TO REDUCE DEMOLATION GENERATED DUST and diesel exaust from trucks and other heavy duty construction equipment on proposed project site and adjacent residential areas and public parks to to the south,north,east and west of the 22 acre construction site,during a 10 year long construction project. R5-5

OMISSION 6)NO INFORMATION PROVIDED ON NUMBER AND CUBIC YARD CAPACITY OF SOLID WASTE CARRYING TRUCKS to be used by waste haulers.TRAILERS PERMITTED? NUMBER OF MILES TO DUMPS AND METHODS USED TO SUPRESS DUST BLOWING FROM TRUCKS IN TRANSIT TO DUMP SITES. R5-6

ERROR 7) DEIR IMPLIES THAT PARKING LOT ASPHALT IS ONLY RECYCABEE MATERIAL TO BE PRODUCED BY DEMOLITION ON 22 ACRE CONSTRUCTION SITE.Factual credibility of revised DEIR severely diminished by that misrepresentation of fact. R5-7

Sincerely, Alexander M. Man
Alexander M.Man -Chairman,Friends of Hazard Park & Park Wetlands.

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