



**Los Angeles City Planning Department**

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**ADDENDUM TO THE  
ENVIRONMENTAL IMPACT REPORT  
FOR THE  
USC HEALTH SCIENCES CAMPUS PROJECT**

**March 2013**

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March 28, 2013

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Re: Addendum to ENV-2004-1950-EIR, State Clearinghouse No. 2004101084, *USC Health Sciences Campus Project*

The Environmental Review Section of the Department of City Planning has reviewed and determined that the Addendum (attached) to the *USC Health Sciences Campus Project* Environmental Impact Report (FEIR) is appropriate and consistent with those standards expressed in California Environmental Quality Act (CEQA) Guidelines Section 15164.

The Environmental Review Section's determination is based on the following: (1) the minor modifications to the project analyzed in the FEIR, including providing for student housing and hotel uses and street reclassifications and associated streetscape improvements to improve the pedestrian environment along several streets within the Health Sciences Campus, will not result in P.M. peak hour trips beyond those set forth in the FEIR and will not cause any new or substantially increased significant environmental impacts; and (2) the entitlement requests will not cause any impacts not previously analyzed in the FEIR. Therefore, the Addendum to FEIR is adequate for environmental clearance purposes.

Should you have any questions, please call Karen Hoo at (213) 978-1331.

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ENV-2012-1035-EAF case file

ENV-2011-3044-EAF case file

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# TABLE OF CONTENTS

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	<b>Page</b>
I. Introduction/Background .....	1
II. CEQA Authority for an Addendum .....	3
III. Project Description.....	5
A. Original Project .....	5
B. USC Health Sciences Campus Projects Constructed and Underway.....	7
C. Modified Project.....	8
IV. Required Approvals .....	18
V. Comparative Analysis Of Modified Project Impacts .....	19
A. Visual Resources.....	20
B. Agriculture Resources .....	23
C. Air Quality and Greenhouse Gas Emissions.....	24
D. Biological Resources .....	38
E. Cultural Resources .....	39
F. Geology and Soils.....	41
G. Hazards and Hazardous Materials .....	43
H. Surface Hydrology and Water Quality, and Groundwater .....	45
I. Land Use and Planning .....	48
J. Mineral Resources .....	60
K. Noise .....	60
L. Population and Housing .....	65

	<b>Page</b>
M. Public Services.....	66
N. Recreation .....	70
O. Traffic, Circulation, and Parking .....	71
P. Utilities/Service Systems .....	83
VI. Conclusion.....	93

**Appendices**

- Appendix A Air Quality Worksheets
- Appendix B Geotechnical Investigation
- Appendix C Phase I Environmental Site Assessment
- Appendix D Traffic Memorandum
- Appendix E Bureau of Engineering Memorandum
- Appendix F Los Angeles Fire Department Memorandum
- Appendix G Los Angeles Department of Transportation Memorandum

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## LIST OF FIGURES

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<b>Figure</b>		<b>Page</b>
1	Aerial View of Development Sites .....	6
2	Conceptual Site Plan—Proposed Graduate Student Housing and Hotel .....	10
3	Conceptual Site Plan—Healthcare Consultation Center IV .....	12
4	Proposed Locations for Installation of Monument Signs .....	16
5	Existing Land Use Designations and Zoning.....	50
6	Proposed Land Use Designations and Zoning.....	56

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## LIST OF TABLES

---

<b>Table</b>		<b>Page</b>
1	Modified Project Development Program Options .....	13
2	Modified Project Regional Construction Emissions (Pounds per Day) .....	28
3	Modified Project Localized Construction Emissions (Pounds per Day) .....	30
4	Modified Project Operation Emissions (Pounds per Day) .....	32
5	Annual GHG Emissions Summary (Metric Tons of Carbon Dioxide Equivalent) .....	35
6	Mitigated Modified Project Localized Construction Emissions (Pounds per Day) ....	37
7	Maximum Ambient Construction Pollutant Impacts ( $\mu\text{g}/\text{m}^3$ ) .....	39
8	Estimated Water Demand—Original Project vs. Modified Project .....	88
9	Estimated Annual Wastewater Generation—Original Project vs. Modified Project ..	89
10	Estimated Annual Solid Waste Generation—Original Project vs. Modified Project ..	91
11	Comparison of Impacts Under Original Project and Modified Project.....	94

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# ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT

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## I. Introduction/Background

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the University of Southern California Health Sciences Campus Project (State Clearinghouse No. 2004101084), certified by the City of Los Angeles in August 2006 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes proposed modifications to the development program for the Health Sciences Campus (HSC) Project to determine whether such modifications would result in any new significant environmental impacts or a substantial increase in the severity of impacts set forth in the Certified EIR.

The Certified EIR analyzed the development of between 585,000 and 765,000 square feet of additional academic and medical-related floor area within the existing Health Sciences Campus in northeast Los Angeles (the Original Project). The Certified EIR analyzed this range of square footages to allow for flexibility in the mix of uses. Medical clinic uses generally have a greater potential to result in environmental impacts as compared to academic or medical research uses. Therefore, an increase in medical clinic uses would require a reduction in academic and/or medical research uses in order for the entire project to remain within the overall environmental envelop analyzed in the Certified EIR. For example, under the Original Project, up to 120,000 square feet<sup>1</sup> of medical clinic uses could be developed with the remainder of the HSC developed with up to 465,000 square feet of academic and/or medical research facilities. In addition, in the event that on-site development were to reach 765,000 square feet, a total of 720,000 square feet of academic and/or medical research uses could be developed, together with a maximum of 45,000 square feet of medical clinic development. These uses would be developed within seven Development Sites (referred to as Development Sites A, B, C, D, E, F, and G) within the HSC.

As discussed further below, the Applicant proposes to modify the Original Project to provide for student housing and hotel uses. Specifically, as part of the modifications, the Applicant would expand the uses within Development Site E to include graduate student

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<sup>1</sup> All references to square feet refer to square feet of floor area as defined in Los Angeles Municipal Code Section 12.03.



housing uses comprising approximately 238,500 square feet and providing 185 dwelling units and a childcare center. A hotel providing up to 275 rooms and comprising approximately 250,000 square feet may also be constructed within Development Site E adjacent to the proposed graduate student housing uses. In addition, a modification to the maximum amount of square footage evaluated in the Certified EIR is proposed. Specifically, as provided by the Certified EIR, flexibility in the amount of floor area to be developed within the Development Sites would be provided so long as the peak-hour vehicle trips associated with such development do not exceed the peak-hour vehicle trips set forth in the Certified EIR. Under the Modified Project, academic/medical research and medical clinic uses would continue to be permitted within the Project Site. The Modified Project also proposes to improve the existing pedestrian and aesthetic environment along San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, Playground Street, and Zonal Avenue between San Pablo Street and Biggy Street. Implementation of the proposed pedestrian enhancement and aesthetic improvements would include modified roadway classifications to allow for narrowing of streets while maintaining traffic lanes and capacity along most roadway segments,<sup>2</sup> widening sidewalks, planting of additional street trees, improving pedestrian lighting, installing street furniture, improving the streetscape with enhanced paving in intersections and decorative banding in sidewalks, and placement of a monument sign at the northwest and southwest corners of Alcazar Street and Soto Street. It is anticipated that the installation of monument signage within the northwest corner of Soto Street and Alcazar Street would include a monument arch, decorative wrought iron fence with integral brick columns, brick pavers with concrete bands, and landscaping and irrigation. Additionally, the southwest corner may include monument signage with a decorative wrought iron fence with integral brick columns, brick pavers with concrete bands, and landscaping and irrigation. To accommodate these improvements, on-street parking would be removed along portions of the affected roadway segments. The specific design details associated with the proposed pedestrian improvements related to roadway striping, crosswalks, turning radii, and installation of traffic control devices would be subject to review and approval by the Los Angeles Department of Transportation's design staff as part of the Bureau of Engineering's B-permit process.

Following implementation of the Modified Project, the HSC would continue to operate as a single, functionally integrated campus. With implementation of the proposed pedestrian enhancements and aesthetic improvements, the Modified Project would

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<sup>2</sup> As shown in Table 13 of the Traffic Memorandum provided as Appendix D, the existing number of lanes would be maintained along most roadway segments, with the exception of the roadway segment at Alcazar Street from San Pablo Street to Playground Street, which would include an additional eastbound traffic lane. Also shown in Table 13 of the Traffic Memorandum, roadway capacities would generally be maintained or increased with the exception of the roadway segment at San Pablo Street from Alcazar Street to Eastlake Avenue/Norfolk Street, which would be reduced due to the removal of the center turn lane separating the northbound and southbound lanes.

promote walkability, increase outdoor space, improve connections within the HSC, improve vehicular circulation around the campus, and enhance linkages between the adjacent Lincoln Park and Hazard Park.

The seven Development Sites described above as well as the roadways proposed to be improved are hereafter collectively referred to as the “Project Site.”

## II. CEQA Authority for an Addendum

As indicated above, this document is an Addendum to the Certified EIR and addresses the proposed changes to the HSC Project set forth in the Certified EIR. The Certified EIR included all statutory sections required by CEQA, comments received on the Draft EIR, responses to comments on the Draft EIR, and supporting technical appendices. CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

*“The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”*

Section 15162 of the CEQA Guidelines requires a Subsequent EIR when an MND has already been adopted or an EIR has been certified and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the Modified Project would not result in any additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Based on this determination, the Modified Project does not meet the requirements for preparation of a Subsequent EIR pursuant to Section 15162 of the CEQA Guidelines.

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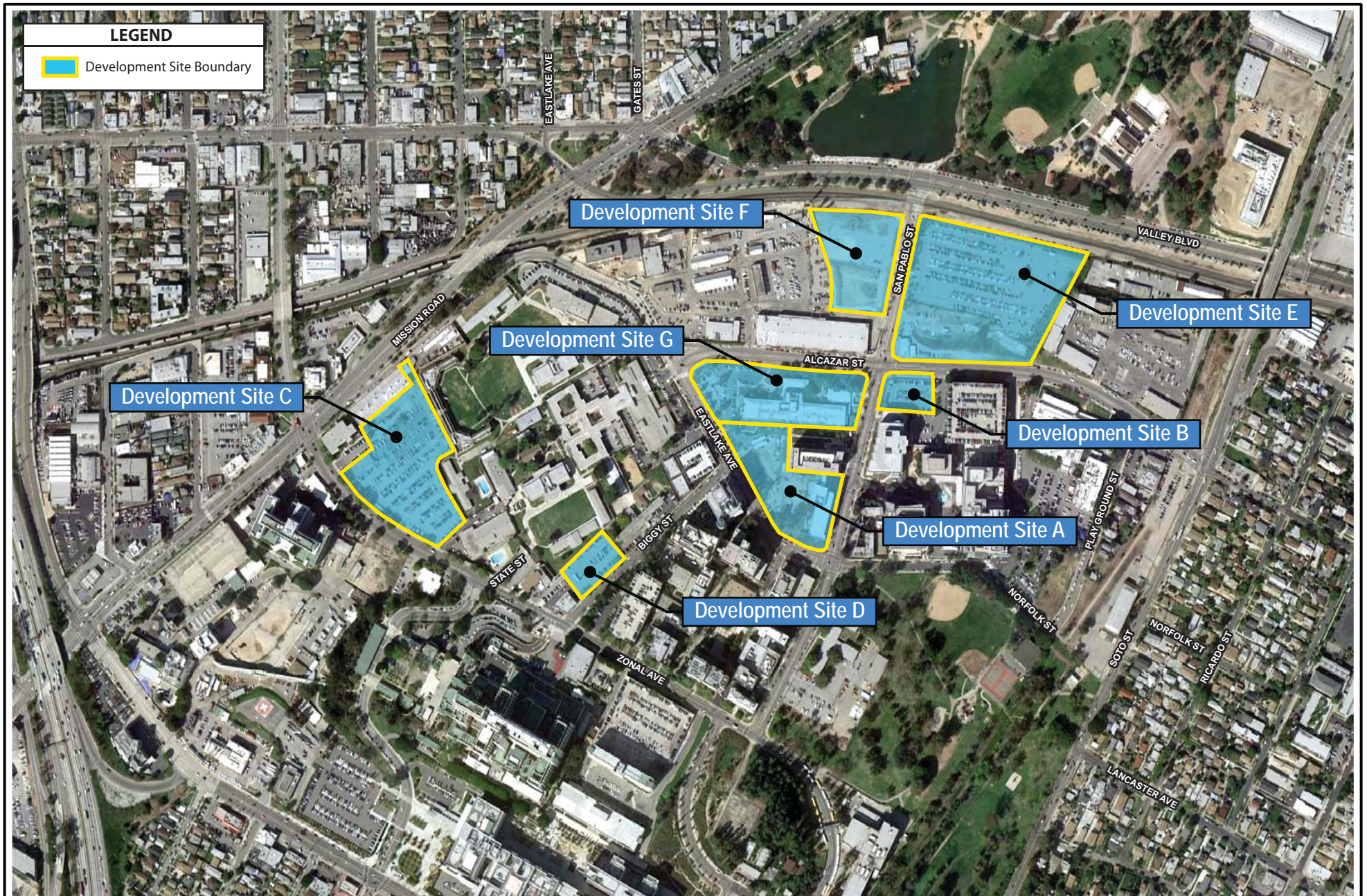
## III. Project Description

### A. Original Project

As indicated above, the Original Project provides for the development of between 585,000 and 765,000 square feet of additional academic and medical-related floor area within the existing HSC. Specifically, under the Original Project, up to 120,000 square feet of medical clinic uses could be developed with the remainder of the campus developed with up to 465,000 square feet of academic and/or medical research facilities. In addition, in the event on-site development were to reach 765,000 square feet, a maximum of 45,000 square feet of medical clinic development and 720,000 square feet of academic and/or medical research uses could be constructed. As shown in Figure 1 on page 6, these uses would be developed within seven Development Sites (referred to as Development Sites A, B, C, D, E, F, and G) within the HSC. A description of the proposed development evaluated for each of the Development Sites is as follows:

- **Development Site A:** Development Site A includes approximately 2.46 acres within the central portion of the HSC. The maximum amount of development analyzed for Development Site A ranges from 120,000 square feet of medical clinic facilities to 465,000 square feet of academic and/or medical research facilities. Maximum building heights of 150 feet were evaluated within Development Site A.
- **Development Site B:** Development Site B includes approximately 1.13 acres located at the northeast corner of Alcazar Street and San Pablo Street. The maximum amount of development analyzed for Development Site B ranges from 120,000 square feet of medical clinic facilities to 295,338 square feet of academic and/or medical research facilities. Parking facilities may also be provided. Maximum building heights of 150 feet were evaluated within this Development Site.
- **Development Site C:** Development Site C includes approximately 3.68 acres that are currently used as a surface parking lot and located in the western portion of the HSC on the north side of Zonal Avenue, between State Street and Mission Road. Under the Original Project, Development Site C would be developed with a multi-story parking structure providing up to 2,800 parking spaces with a height not to exceed 75 feet.
- **Development Site D:** Development Site D is comprised of approximately 0.77 acre and is currently used as a surface parking lot. Development Site D is located on the west side of Biggy Street between Zonal Avenue and Eastlake Avenue. Under the Original Project, permitted development for Development Site D includes a combination of academic/medical-related uses and parking. If only academic and medical-related uses are constructed, the maximum amount





Source: Google Earth, 2012.



of development would be limited to 59,000 square feet of medical clinic facilities to up to 200,000 square feet of academic and/or medical research facilities. Maximum building heights of 140 feet were analyzed for Development Site D.

- **Development Site E:** Development Site E consists of approximately 7.64 acres that are currently used for surface parking. Development Site E is located on the east side of San Pablo Street between Alcazar Street and Valley Boulevard. The maximum amount of development for Development Site E under the Original Project would range from 118,000 square feet of medical clinic facilities to 400,000 square feet of academic and/or medical research facilities. Parking facilities may also be provided. Maximum building heights of 100 feet have been evaluated for Development Site E.
- **Development Site F:** Development Site F is comprised of approximately 2.65 acres located on the west side of San Pablo Street. The maximum amount of development for Development Site F under the Original Project would range from approximately 118,000 square feet of medical clinic facilities to 400,000 square feet of academic and/or medical research facilities. Parking facilities may also be developed. Maximum building heights of 100 feet for this Development Site were analyzed in the Certified EIR.
- **Development Site G:** Development Site G is comprised of approximately 4.0 acres of a larger 8.06-acre parcel. The maximum development approved ranges from approximately 29,500 square feet of medical clinic facilities to 100,000 square feet of academic and/or medical research facilities. Maximum building heights of 100 feet were evaluated for Development Site G.

The Original Project also included the creation of new exterior courtyards and walkways between and around the proposed buildings. These spaces included plantings that would complement the existing landscaping program throughout the HSC. The proposed buildings also featured signage and lighting consistent with existing HSC lighting and signage. Additionally, parking for the Original Project was proposed to be provided within Development Sites C and/or B, D, E, and F. Moreover, the Original Project proposed to connect sidewalks and pedestrian walkways between buildings to the parking with the proposed and existing buildings within the HSC, as well as via the on-campus shuttle program. In addition, drop-off and delivery areas were included at each of the proposed buildings.

## **B. USC Health Sciences Campus Projects Constructed and Underway**

Since preparation of the EIR, the new 62,500-square-foot Eli and Edythe Broad CIRM Center for Regenerative Medicine and Stem Cell Research (Broad Center) has been constructed and is currently in operation. This new facility is located within Development

Site A. In addition, the Healthcare Consultation Center Three (HCC III), which includes development of 92,700 square feet of medical clinic uses and 9,900 square feet of non-clinical uses, is currently in the site plan review approval process with the City of Los Angeles. This facility will be located within Development Site B. The analysis of the potential physical effects of the Modified Project provided below also accounts for the potential physical effects associated with the Broad Center and HCC III.

Other improvement projects currently underway within the HSC include the Los Angeles Department of Water and Power Utilities Project; the Norfolk Street extension; and modifications to the in-patient and out-patient circulation system. These projects are not a part of the Modified Project and are being or will be undertaken regardless of whether the Modified Project proceeds. However, they are described here as they are currently anticipated to be completed and in operation at buildout of the Modified Project. In addition, as described further below, while the physical improvements associated with the Norfolk Street extension would not be implemented as part of the Modified Project, the proposed reclassification of Norfolk Street would be included as part of the Modified Project's request for a general plan amendment.

In conjunction with the Los Angeles Department of Water and Power, USC has proposed to move all communication and energy transmission lines below ground throughout the HSC Campus. With the proposed Norfolk Street extension, Norfolk Street will be extended from its current eastern terminus at Playground Street to a new intersection with Soto Street. This will provide an additional major access point to the HSC and will be designated as the primary entrance for hospital in-patient visitors. In addition, as part of the modifications to the in-patient and out-patient circulation, in-patient and out-patient access would be separated, with in-patient access located on Norfolk Street and the out-patient drop-off areas located off of Alcazar Street. With this separation of in-patient and out-patient circulation, use of San Pablo Street between Alcazar Street and Eastlake Avenue/Norfolk Street as an access point would be reduced.

## **C. Modified Project**

The Applicant proposes to modify the Original Project to provide for student housing and hotel uses to support the University. In addition, a modification to the maximum amount of square footage evaluated in the Certified EIR is proposed. Specifically, as provided in the Certified EIR, flexibility in the amount and type of floor area to be developed within the Development Sites would be provided so long as the peak-hour vehicle trips do not exceed the peak-hour vehicle trips set forth in the Certified EIR. Additionally, the Modified Project proposes pedestrian enhancements and aesthetic improvements within and surrounding the HSC.

Four development options illustrating how the proposed flexibility of uses may be implemented are described further below. A more detailed description of the Modified Project is also provided below.

## 1. Student Housing Component

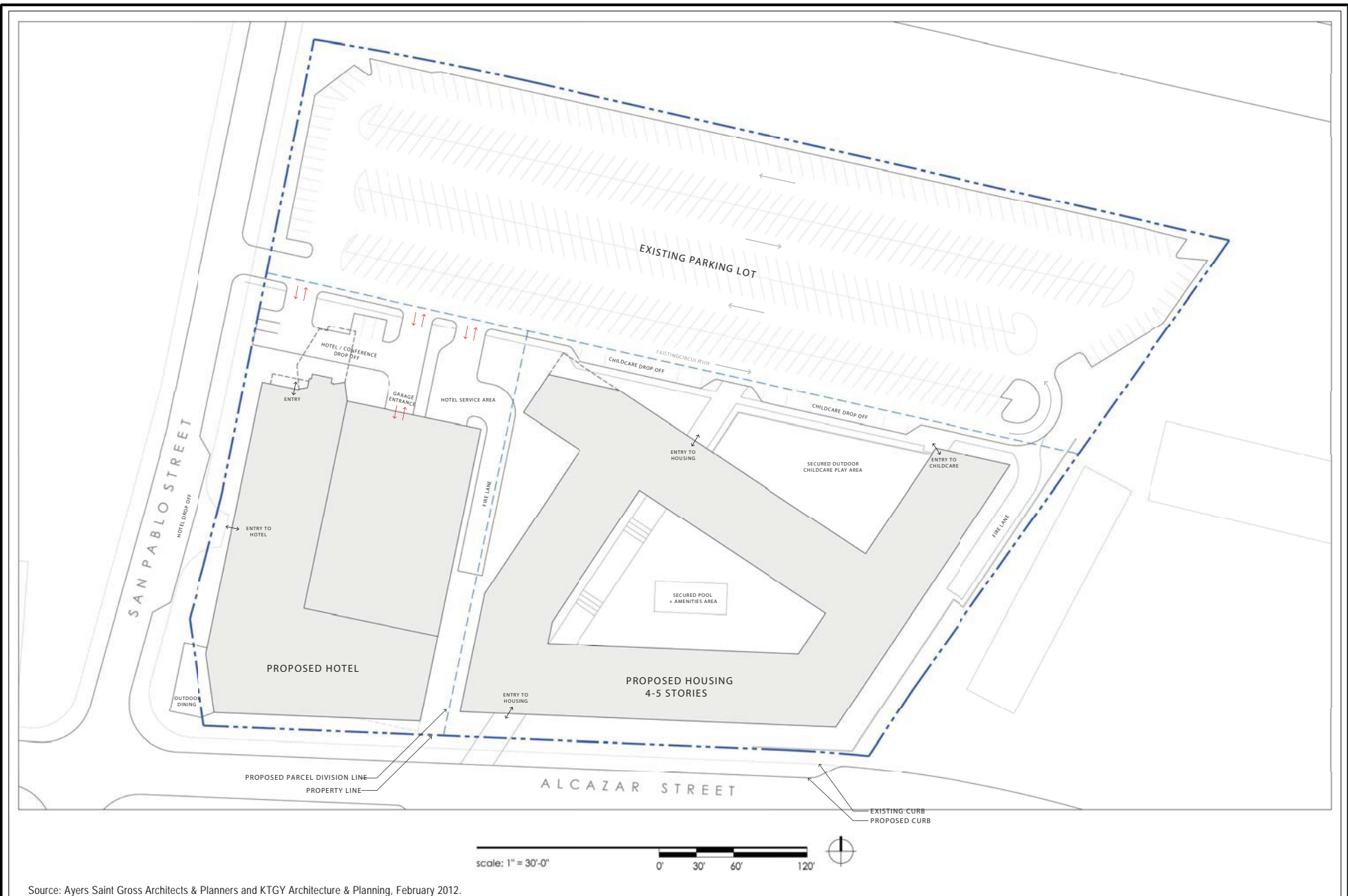
The Applicant proposes to expand the uses within Development Site E to include graduate student housing uses comprising approximately 238,500 square feet and providing 185 dwelling units, associated amenities, and a childcare center. It is anticipated that the 185 dwelling units would comprise approximately 219,500 square feet of floor area, while the amenities and childcare uses would comprise approximately 7,500 and 11,500 square feet of floor area, respectively. The approximately 7,500 square feet of amenities would include a social lounge, fitness center, business center with study rooms, and an on-site management and leasing office. The childcare center is anticipated to accommodate 100 to 150 children and would only be open to students/employees/affiliates of the HSC.

The new student housing building would be comprised of four to five stories with a maximum building height of approximately 67 feet. As shown in the conceptual site plan provided in Figure 2 on page 10, open space amenities including a new swimming pool and landscaped open space areas would form the central portion of the student housing site. Outdoor landscaped open space areas would also be located adjacent to the childcare use to the north of the childcare uses within the northern portion of the student housing site. In addition, landscaped pedestrian walkways would be provided throughout the student housing site. Construction of the student housing component is expected to commence in January 2013 and be completed in August 2014.

## 2. Potential Hotel Component

A hotel providing up to 275 rooms may also be constructed within Development Site E to the west of the proposed graduate student housing uses. The proposed hotel would comprise approximately 250,000 square feet and would include approximately 40,000 square feet of amenities (e.g., fitness center, business center), approximately 30,000 square feet of conference center area, approximately 5,000 square feet of ancillary restaurant uses, and approximately 1,000 square feet of ancillary retail uses. In addition, the hotel tower would be up to approximately 175 feet in height, which would be greater than the 100-foot building height set forth in the Original Project for this Development Site, but generally consistent with the taller building heights in the project vicinity. Construction of the hotel component could commence as early as January 2014, with construction completed as early as March 2016.





Source: Ayers Saint Gross Architects & Planners and KTG Architecture & Planning, February 2012.

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### 3. Academic/Medical Research and Medical Clinic Uses

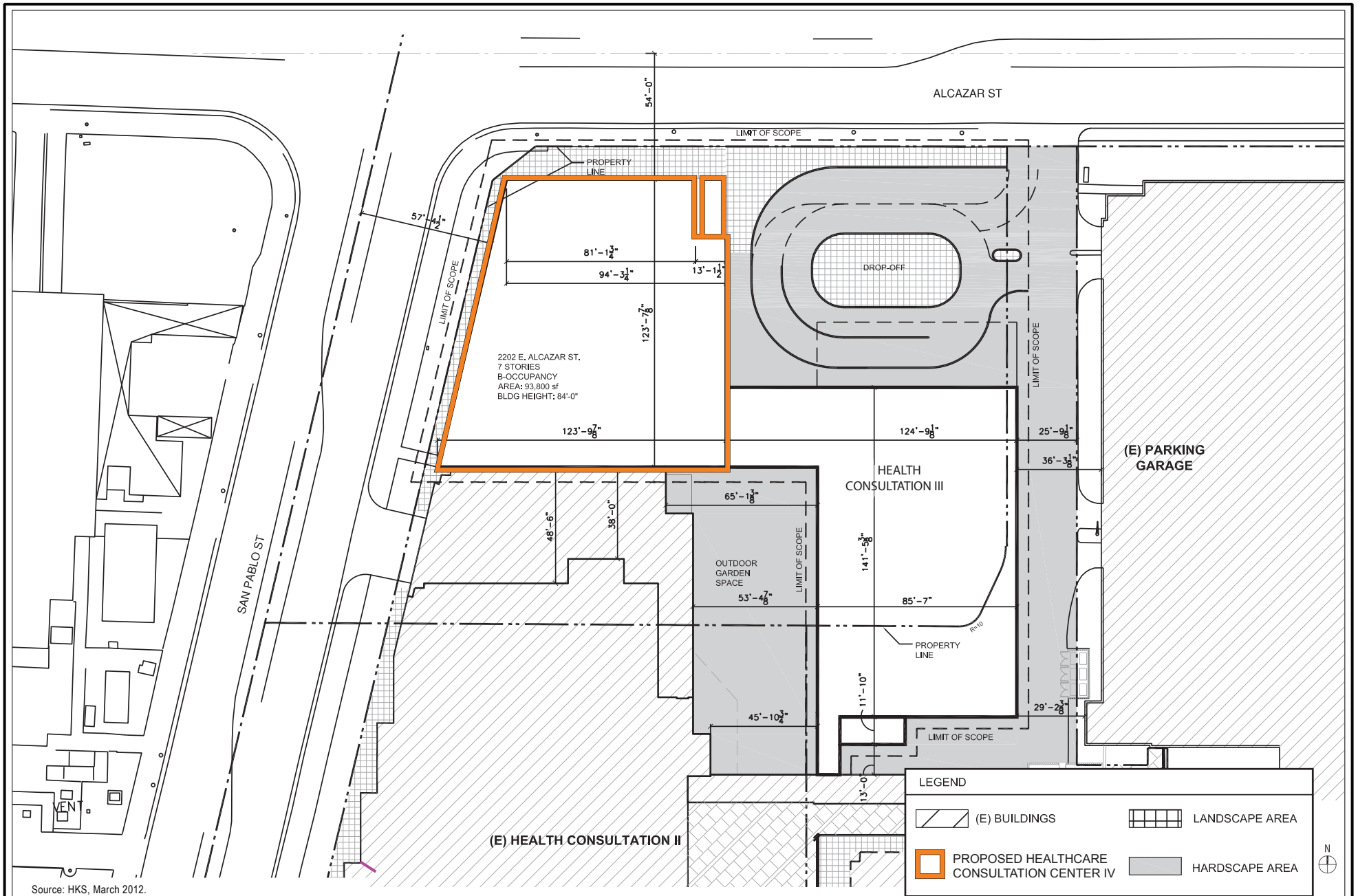
Under the Modified Project, academic/medical research and medical clinic uses would continue to be developed, consistent with the Original Project. Specifically, a seven-story, approximately 84-foot-high HCC IV building is anticipated to be constructed within Development Site B. Based on the development option ultimately chosen, this new building may include up to 99,800 square feet of medical clinic uses only or up to 96,800 square feet of medical clinic uses and up to 9,900 square feet of non-clinical uses. Construction of HCC IV could commence as early as May 2013 with construction completed as early as January 2015. A conceptual site plan for HCC IV is provided in Figure 3 on page 12.

### 4. Development Options

As described above, the Applicant proposes to add student housing and hotel uses to the uses within HSC. Table 1 on page 13 provides four concepts or options that illustrate how these uses may be integrated with the medical research/academic and medical clinic uses set forth under the Original Project. Under the Modified Project, various mixes of the student housing, hotel, academic/medical research and medical clinic uses would be permitted as long as the peak-hour trips do not exceed the number of trips set forth in the Certified EIR. Four development options illustrating how these land uses may be integrated are provided below. All of these development options would generate similar amounts of peak-hour trips.

#### *(a) Option 1*

As shown in Table 1 on page 13, Option 1 would include development of approximately 27,300 square feet of additional medical clinic uses within a new healthcare consultation center (HCC IV) within Development Site B. In addition, within Development Site E, Option 1 proposes development of graduate student housing uses comprising approximately 238,500 square feet and providing 185 dwelling units, approximately 7,500 square feet of amenities, and an approximately 11,560-square-foot childcare center. Option 1 also includes development of hotel uses comprising approximately 250,000 square feet and providing 275 rooms, approximately 40,000 square feet of hotel amenities, a 30,000 square foot conference center, a 5,000-square-foot restaurant, and 1,000 square feet of retail uses. As previously described, the hotel may be developed adjacent to the proposed graduate student housing uses within Development Site E. Lastly, Option 1 also proposes development of approximately 256,000 square feet of additional medical research uses within one of the Development Sites as set forth under the Original Project. Heights of proposed structures would range from approximately 67 feet to 175 feet.



**Table 1  
Modified Project Development Program Options**

Land Use	Original Project	Projects Constructed and Underway	Modified Project Land Use Options <sup>b</sup>			
			Option 1	Option 2	Option 3	Option 4
Medical Clinic Facilities	45,000 to 120,000 sf <sup>a</sup>	92,700 sf	27,300 sf	92,700 sf	96,800 sf	99,800 sf
Non-Clinical Facilities	—	9,900 sf	—	9,900 sf	9,900 sf	—
Graduate Student Housing	—	—	238,500 sf (185 du)	238,500 sf (185 du)	238,500 sf (185 du)	238,500 sf (185 du)
Hotel	—	—	250,000 sf (275 rm)	—	250,000 sf (275 rm)	250,000 sf (275 rm)
Academic/Medical Research	465,000 to 720,000 sf <sup>a</sup>	62,500 sf	256,000 sf	144,000 sf	—	—

*sf = square feet*  
*du = dwelling units*  
*rm = rooms*

<sup>a</sup> Under the Original Project, up to 120,000 square feet of medical clinic uses could be developed with the remainder of the HSC developed with up to 465,000 square feet of academic and/or medical research facilities. In the event that medical clinic uses, which are more trip-intensive, is limited to 45,000 square feet, a total of 720,000 square feet of academic and/or medical research uses could be developed, for a total of 765,000 square feet of development.

<sup>b</sup> These represent a range of options that could be accommodated within the remaining trip generation of the approved 2005 EIR. It is noted that as part of the Modified Project, the Applicant proposes to provide flexibility in the amount and type of floor area to be developed, so long as the peak-hour vehicle trips do not exceed that set forth in the Certified EIR.

Source: Gibson Transportation, Matrix Environmental, 2013.

*(b) Option 2*

Similar to Option 1, Option 2 would include additional medical clinic uses within a new HCC IV. However, Option 2 proposes substantially more square footage of medical clinic uses (approximately 92,700 square feet) and also includes non-clinical uses (approximately 9,900 square feet) within the new HCC IV. However, no hotel uses would be developed as part of Option 2. In addition, as with Option 1, Option 2 would include the graduate student housing component (approximately 185 units and associated amenities, as well as a childcare component). Finally, Option 2 would provide approximately 144,000 square feet of additional medical research uses within one of the seven Development Sites.

*(c) Option 3*

Option 3 proposes approximately 96,800 square feet of additional medical clinic uses and approximately 9,900 square feet of non-clinical uses within a new HCC IV. Similar to both Options 1 and 2, Option 3 would also include the graduate student housing component with approximately 185 dwelling units and associated amenities, as well as a childcare component. Also similar to Option 1, this Option proposes the 275-room hotel component as described under Option 1. Additional medical research uses within one of the seven Development Sites would not be provided under Option 3.

*(d) Option 4*

Option 4 proposes approximately 99,800 square feet of additional medical clinic uses within HCC IV. However, no new non-clinical uses would be provided within HCC IV. In addition, Option 4 would also include the graduate student housing component as described above. Also similar to Option 1, this Option proposes the 275-room hotel component as described under Option 1. Additional medical research uses within one of the seven Development Sites would not be provided under Option 4.

## 5. Features Common to all Development Options

In order to minimize potential conflicts between construction activity and through traffic, the Modified Project would include the development of a Construction Management Plan for use during construction. Features of the Construction Management Plan may include, but would not be limited to: limiting potential lane closures to off-peak travel periods, to the extent feasible; maintaining existing access for adjacent uses; prohibiting parking by construction workers on adjacent streets and directing construction workers to utilize on-site or other HSC-designated parking areas; scheduling receipt of construction materials during non-peak travel periods, to the extent feasible; and complying with approved construction traffic control plans that identify traffic control measures, signs,

delineators, etc., to be implemented by the construction contractor throughout the duration of construction.

Additionally, similar to the Original Project, the Modified Project would be designed to be compatible with the existing buildings within and surrounding the HSC. In addition, similar to the Original Project, the Modified Project would provide new landscaped walkways between and around the proposed buildings. Proposed signage would include monument signs, building identification signs, directional signage, and wall signs on the buildings' street fronting façades. Signage would be consistent with the signage regulations as provided in the City of Los Angeles Municipal Code and would be visually integrated with the proposed and existing development to employ a consistent design theme. The Modified Project would also include exterior lighting on buildings for security and entryway lighting, within the parking facilities, and along driveways and roadways for safety. In addition, low-level lighting to accent architectural, signage, and landscaping elements may be incorporated throughout the site. Pedestrian-oriented light posts would also be located along pedestrian pathways and along the street frontages. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting. The Modified Project would also comply with the standards of the Los Angeles Green Building Code for achieving water efficiency and conservation; material conservation and resource efficiency; and environmental quality.

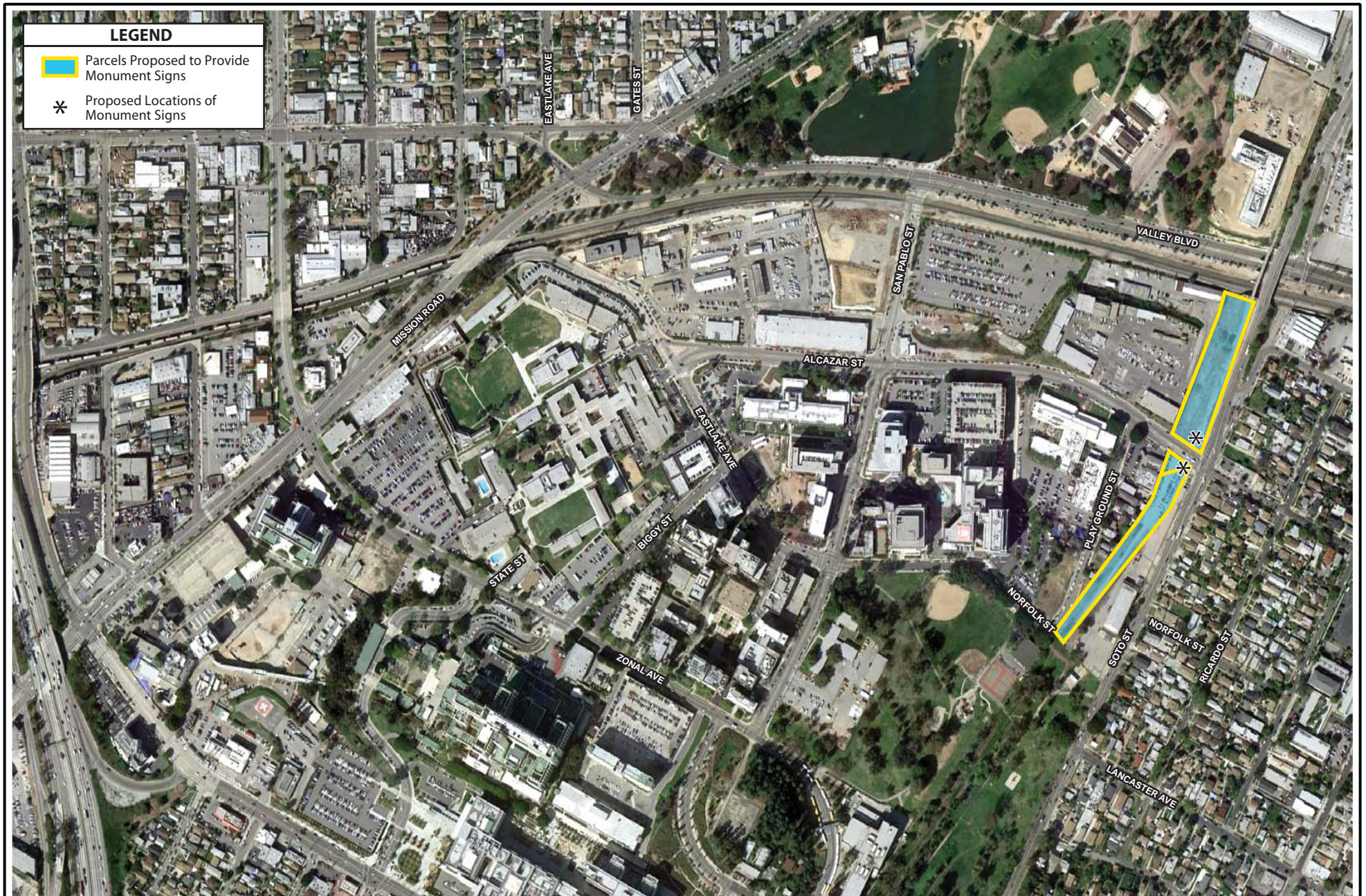
Access to the graduate student housing and hotel uses is planned to be provided via San Pablo Street and shared with the driveway of the existing surface parking lot. In addition, access to the proposed HCC IV is planned to be provided via driveways along Alcazar Street. Parking for the Modified Project would be provided within one of the existing surface parking lots or parking structures located within the HSC.

## 6. Proposed Streetscape Improvements and Monument Signs

As previously noted, pedestrian enhancements and aesthetic improvements are proposed along San Pablo Street, Alcazar Street, Playground Street, Eastlake Avenue, Norfolk Street, Biggy Street, and Zonal Avenue between San Pablo Street and Biggy Street. Additional pedestrian and aesthetic improvements, including the installation of monument signs, are also proposed within one parcel located northwest and two parcels located southwest of Alcazar Street and Soto Street, as shown in Figure 4 on page 16.

Improvements would include narrowing of roadways while maintaining traffic lanes and capacity; widening of sidewalks; planting of new landscaping and installation of improved pedestrian lighting and street furniture; the addition of enhanced paving in intersections and decorative banding in sidewalks to enhance the streetscape; and placement of monument signs at the northwest and southwest corners of Alcazar Street







and Soto Street. It is anticipated that the installation of monument signage within the northwest corner of Soto Street and Alcazar Street would include a monument arch, decorative wrought iron fence with integral brick columns, brick pavers with concrete bands, and landscaping and irrigation. Additionally, the southwest corner may include a monument sign with a decorative wrought iron fence with integral brick columns, brick pavers with concrete bands, and landscaping and irrigation. To accommodate these improvements, on-street parking would be removed along portions of the affected roadway segments.

These improvements would reduce the potential for pedestrian/vehicular conflicts and enhance pedestrian safety and connectivity by narrowing intersections to the minimum required by traffic demands and providing curb extensions in place of turn lanes that favor the vehicle. Specifically, the Modified Project would narrow portions of the roadway along San Pablo Street, Alcazar Street, and Eastlake Avenue in order to provide widened pedestrian sidewalks, improved landscaping, and streetscape enhancements. To allow for these improvements, the current roadway classifications would be modified to reflect the proposed enhancements and facilitate an orderly traffic circulation pattern throughout the HSC. Specifically, San Pablo Street would be reclassified from a secondary highway to a modified collector street along most of the roadway segment and from a secondary highway to a modified local street between Alcazar Street and Eastlake Avenue/Norfolk Street. Additionally, Alcazar Street and Eastlake Avenue would be reclassified from collector streets to modified collector streets, and Norfolk Street would be reclassified from a paper street/local street to a modified collector street.<sup>3</sup> Biggy Street and Playground Street would be reclassified from local streets to modified local streets. No changes would occur to the roadway classification and roadway width of Zonal Avenue would occur.

As part of the Project design, all street crossings would be differentiated from the asphalt roadway and appropriate signalization would be incorporated. In addition, pedestrian lights, placed between existing and proposed street trees along the right-of-way, would reinforce the streetscape hierarchy and identity of the HSC. Benches paired with trash and recycling receptacles, would be integrated in locations of pedestrian flow and congregation so as to promote a sense of community on campus while beginning to establish locations of opportunity for public gathering spaces. Bike racks located in close proximity to building entrances would provide the campus community with a healthy

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<sup>3</sup> *It should be noted that the University has proposed to extend Norfolk Street from its current terminus at Playground Street to Soto Street, resulting in a new signalized intersection with Soto Street. The proposed Norfolk Street extension, which is part of the City's Master Plan of Highways, is currently in the site plan review process with the City. While the physical improvements associated with the Norfolk Street extension would not be implemented as part of the Modified Project, the proposed reclassification of Norfolk Street (including the new segment from Playground Street to Soto Street) from a paper street/local street to a modified collector street would be included as part of the Modified Project's request for a general plan amendment.*



alternative to commuting to and from the campus. In addition, due to the length of some blocks and the desire to increase connectivity across the major vehicular corridors within the campus, midblock pedestrian crossings are also anticipated. Additionally, where on-street parking occurs, planted bulb-outs would be incorporated to protect the pedestrian, and narrow the crossing distance. Where on-street parking is eliminated in favor of a wider sidewalk, a traditional pedestrian curb cut would be employed. The specific design details related to roadway striping, crosswalks, turning radii, and installation of traffic control devices would be subject to review and approval by the Los Angeles Department of Transportation's design staff as part of the Bureau of Engineering's B-permit process.

Access to the overall HSC would continue to be provided along Zonal Avenue at Mission Avenue, Eastlake Avenue at Mission Road, San Pablo Street at Valley Boulevard, San Pablo Street at Zonal Avenue, and Alcazar Street at Soto Street. In addition, metered curbside parking would continue to be provided along the east side of San Pablo Street between Norfolk Street and Zonal Avenue; the northern side of Alcazar Street between Soto Street and Eastlake Avenue and on the southern side of Alcazar Street between Eastlake Avenue and San Pablo Street; the southern side of Norfolk Street adjacent to Hazard Park; the southwestern side of Eastlake Avenue between Biggy Street and Alcazar Street; and along the west side of Biggy Street.

Construction of these improvements is anticipated to occur as a phased development with anticipated buildout in 2015.

## IV. Required Approvals

The following discretionary actions are proposed to implement the Modified Project:

- General Plan Amendment from Limited Industrial to General Commercial or Neighborhood Commercial for Development Site E;
- General Plan Amendment to the Northeast Los Angeles Community Plan and the Transportation Element of the City of Los Angeles General Plan for reclassification of San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, and Playground Street;
- General Plan Amendment to change the land use designation on two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from Public Facilities to General Commercial;<sup>4</sup>
- Zone Change from CM-1 and [T][Q]CM-1 to [T][Q]C2-2 for Development Site E;

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<sup>4</sup> This General Plan Amendment is proposed to accurately reflect private ownership and to allow for the installation of monument signage within these parcels.

- Zone Change for two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from PF-1 to [Q]C2-1;<sup>5</sup>
- Subdivision approval (parcel map or lot line adjustment) to create separate legal parcels for the hotel and student housing projects;
- Conditional Use Permit for alcohol service in the hotel;
- Site Plan Review for the various components pursuant to LAMC Section 16.05.C;
- Haul Route Permit;
- Grading, excavation, and building permits; and
- Any other permits or approvals as may be required.

Maps illustrating the existing and proposed land use designations and zoning for the Development Sites are provided further below in Subsection V.I, Land Use.

## V. Comparative Analysis of Modified Project Impacts

The analyses provided below address each of the environmental issues analyzed in the Certified EIR and focus on the potential changes in environmental impacts due to the Modified Project. The analysis of each environmental issue first summarizes the findings of the Certified EIR, and then analyzes the potential physical effects of the Modified Project. It should be noted that for conservative purposes, the analyses of impacts associated with the Modified Project provided below consider the potential impacts of Option 1 shown in Table 1 on page 13 as this option would result in the greatest potential for environmental impacts. The analyses provided below also account for the physical environmental effects associated with the Broad Center and HCC III. These impacts attributable to the Modified Project (including the Broad Center and HCC III) are then compared with the analysis and findings within the Certified EIR to determine if such impacts are within the envelope of impacts documented in the Certified EIR. Any changes to the mitigation measures of the Original Project are also provided where necessary for each of the issue areas addressed in the Certified EIR.

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<sup>5</sup> *This Zone Change is proposed to accurately reflect private ownership of these parcels and to allow for the installation of monument signage within these parcels. The proposed Q condition would prohibit further development within these parcels without a plan approval and, if required, further CEQA review.*

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## A. Visual Resources

### 1. Original Project Impacts

#### *(a) Construction*

Construction of the Original Project would involve the demolition and removal of six surface parking lots and one vacant lot within the existing HSC. All of the existing ornamental trees and landscaping on those lots and street trees would be removed to allow for the construction of the Original Project. The removal of street trees would detract from the visual character of the area and would create a temporary potentially significant aesthetic impact. In addition, construction fencing along streets and sidewalks would potentially serve as a target for graffiti, if not appropriately monitored, and could further temporarily degrade the visual character of the area. However, the Original Project would provide for landscape plantings and trees along the perimeter of each Development Site, which would result in an improvement over existing conditions. In addition, all street trees removed would be replaced in accordance with standard City requirements. Furthermore, the Applicant would contract with a graffiti removal company and would monitor each construction site. As set forth in the Certified EIR, with implementation of Mitigation Measure B-1 provided below, visual impacts associated with construction of the Original Project would be less than significant.

#### *(b) Operation*

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. 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. 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 Original 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 Original 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. In addition, the maximum heights proposed under the Original Project of 150 feet within Development Sites A and B; 75 feet within Development Site C; 140 feet within Development Site D; and 100 feet within Development Sites E, F, and G, would be comparable to the existing HSC

buildings. Furthermore, the Original Project would incorporate numerous pedestrian-oriented design features including sidewalks, exterior courtyards and pedestrian walkways. Therefore, the Original 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. In addition, shadows cast by the proposed structures during the spring, summer, fall, and winter months would not extend onto any of the shadow-sensitive uses in the vicinity of the seven Development Sites longer than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October. Furthermore, exterior signage for the proposed buildings would be compatible with the design of the existing signage within the HSC and would comply with the 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 Original Project operations would be less than significant.

## 2. Modified Project Impacts

### *(a) Construction*

Similar to the Original Project, visual quality impacts during construction of the Modified Project may result from the temporary creation of construction sites, tree removal, and the potential placement of graffiti on construction barriers. However, as the types of construction activities that would occur under the Modified Project would be generally similar to those anticipated for the Original Project, potential issues associated with construction of the Modified Project would also be the same. In addition, as with the Original Project, the Modified Project would replace any trees in accordance with City standards and would implement the same mitigation measure to address the unauthorized placement of materials on any temporary construction barriers. Therefore, with the implementation of the Original Project's recommended mitigation measure, visual quality impacts during construction of the Modified Project would also be reduced to less than significant levels. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

### *(b) Operation*

As with the Original Project, the Modified Project would alter the visual character of the Project Site and surrounding area by replacing existing surface parking lots and infill areas with new structures providing for student housing, hotel, medical clinic, medical research and/or academic uses, and improving the streetscape within the HSC. With respect to visual quality, the Original Project provided for the construction of additional academic and medical-related floor area and parking facilities within the Project Site. Although the Modified Project proposes to expand the uses within Development Site E to

provide for student housing and hotel uses related to the University and potentially provide for more overall square footage, this change is not anticipated to result in additional visual quality impacts as the design of the proposed structures would be compatible with the existing HSC buildings and other surrounding uses. Specifically, similar to the Original Project, the design of the Modified Project would complement the existing HSC in terms of architecture, signage, lighting, landscape, and hardscape. In addition, though the height of the proposed hotel would exceed the 100-foot height anticipated for Development Site E under the Original Project by up to 75 feet, this modification would not result in new view blockages of visual resources as compared to the Original Project. Overall, the heights of the proposed buildings would be compatible with the maximum heights allowed for other Development Sites, including Development Sites A and B (150 feet) and existing multi-story buildings within and surrounding the HSC, such as the Los Angeles County/USC Medical Center Building, which has a building height of up to 247 feet.<sup>6</sup> Therefore, as with the Original Project, the Modified Project would not introduce elements that would substantially detract from the existing visual character or primary visual resources of the area and would not remove or demolish elements that contribute positively to the visual character of the area. Rather, the Modified Project would replace existing surface parking lots, which offer limited aesthetic value to the area, with new contemporary buildings that would serve to enhance the overall appearance of the HSC. In addition, with implementation of the pedestrian enhancements and aesthetic improvements, the new streetscape would enhance the appearance of the campus while promoting walkability. Furthermore, increased outdoor space, improved connections within the HSC and to the surrounding community, and enhanced linkages between Lincoln Park and Hazard Park would also be provided. Additionally, benches paired with trash and recycling receptacles would be integrated in locations of pedestrian flow and congregation so as to promote a sense of community on campus while helping to establish locations of opportunity for public gathering spaces. Moreover, like the Original Project, the Modified Project would implement the mitigation measures set forth below that would assure that the Modified Project would be visually compatible with existing development and would not degrade the visual environment. Thus, as with the Original Project, impacts related to visual quality would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

### 3. Mitigation Measures

A Mitigation Monitoring and Reporting Program (MMRP) was adopted for the Original Project. The mitigation measures set forth in the MMRP included in the Certified EIR to address visual quality impacts would also apply to the Modified Project. No additional mitigation measures are required for the development of the Modified Project as no

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<sup>6</sup> *Emporis, Building Directory, [www.emporis.com/building/losangelescountyuscmedicalcenter-losangeles-ca-usa](http://www.emporis.com/building/losangelescountyuscmedicalcenter-losangeles-ca-usa), accessed March 28, 2012.*

significant aesthetic impacts would result from implementation of the Modified Project. The mitigation measures identified in the Certified EIR include the following:

*(a) Construction*

**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.

*(b) Operation*

**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.

## **B. Agriculture Resources**

### **1. Original Project Impacts**

No agricultural uses or related operations are present on the Project Site or within the surrounding area, nor is the Project Site considered prime or unique farmland of

statewide or local importance as identified by the State Department of Conservation and the City of Los Angeles General Plan. The Project Site is also not zoned for agricultural uses, nor is it under a Williamson Act contract. Therefore, the Original Project would not result in the conversion of designated farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses. As such, under the Original Project, no impacts to agricultural uses would occur, and no mitigation measures are necessary.

## 2. Modified Project Impacts

There are no existing or mapped agricultural resources within the Project Site and such uses are not proposed as part of the Modified Project. Therefore, similar to the Original Project, the Modified Project would not result in impacts to agricultural resources. Thus, impacts on agricultural resources under the Modified Project would be within the envelope of impacts identified in the Certified EIR.

## C. Air Quality and Greenhouse Gas Emissions

### 1. Original Project Impacts

#### *(a) Construction*

Construction-related daily (short-term) emissions are expected to exceed South Coast Air Quality Management District (SCAQMD) significance thresholds for NO<sub>x</sub> and ROC.<sup>7</sup> Thus, emissions of these pollutants would result in significant short-term regional air quality impacts. Daily emissions of CO, SO<sub>x</sub>, and PM<sub>10</sub> would be considered adverse, but less than significant, since the levels of these emissions would fall below the SCAQMD significance thresholds.

Potential maximum CO, SO<sub>2</sub> and NO<sub>2</sub> concentrations, when added to background ambient concentrations, would not violate their respective Ambient Air Quality Standards at any of the 16 sensitive receptor locations. However, the Original Project would result in localized PM<sub>10</sub> concentrations during construction that exceed the SCAQMD's significance threshold at 13 of the 16 sensitive receptor locations. Therefore, construction of the Original Project would result in a significant and unavoidable impact on localized air quality with respect to PM<sub>10</sub> concentrations.

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<sup>7</sup> Subsequent to completion of the Certified EIR, SCAQMD changed the pollutant Reactive Organic Compounds (ROC) to Volatile Organic Compounds (VOC). For purposes of this analysis, the two terms are interchangeable.

The Original Project would not result in a long-term (i.e., 70 years) substantial source of Toxic Air Contaminant emissions, with no residual emissions after construction and corresponding individual cancer risk. In addition, via mandatory compliance with SCAQMD rules, no construction activities or materials are proposed that would create objectionable odors. As such, Project-related toxic emission and odor impacts during construction would be less than significant.

*(b) Operations*

Regional emissions resulting from the Original Project would not exceed regional SCAQMD thresholds for ROC, SO<sub>x</sub>, CO, or PM<sub>10</sub>. However, the Original Project would exceed the regional SCAQMD threshold for NO<sub>x</sub>, and impacts associated with this pollutant would be significant.

The Original Project would not have a significant impact relative to 1-hour or 8-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. In addition, the operation of the Original Project's parking structure would not cause or localize air quality impacts related to mobile sources. Furthermore, compliance with SCAQMD rules and regulations regarding stationary-source combustion equipment would ensure that contributions to localized PM<sub>10</sub> concentrations remain below the SCAQMD significance threshold. As the Original Project does not cause an exceedance of an ambient air quality standard, the Original Project's localized operational air quality impacts would therefore be less than significant.

The potential exists that the later stages of construction could occur concurrently with the occupancy of the earlier stages of development. Concurrent construction and operational emissions would exceed regional SCAQMD daily thresholds for NO<sub>x</sub>, and ROC, but would not exceed the regional SCAQMD daily threshold for CO, SO<sub>x</sub>, or PM<sub>10</sub>. Thus, a significant regional air quality impact due to NO<sub>x</sub>, and ROC emissions would occur.

Potential sources of air toxics (e.g., truck traffic on local streets, on-site truck idling and movement and operation of transportation refrigeration units) would be dispersed among the Development Sites (i.e., at multiple loading dock, boiler and emergency backup generator locations). In addition, the Original 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. Furthermore, the Original Project does not include any uses identified by the SCAQMD as being associated with odors. As such, impacts with regard to toxic contaminants and odors from operation of the Original Project would be less than significant.



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## 2. Modified Project Impacts

### *(a) Construction*

Similar to the Original Project, construction of the Modified 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<sub>x</sub>, would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release VOCs. 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.

Daily regional emissions during construction were forecasted by assuming a conservative start date (i.e., assuming all construction occurs at the earliest feasible date) and applying the off-road and mobile-source emissions factors derived from the California Air Resources Board's (CARB) OFFROAD2007 and EMFAC2011 models. The emission calculation procedures were conducted consistent with the most recent version of the URBEMIS model (URBEMIS 2007). Details are presented in Appendix A. The calculations reflect the types and quantities of construction equipment that would be used to remove existing structures and pavement; grade and excavate the Project Site; construct the proposed buildings, structures and related improvements; and plant new landscaping within the Project Site. Construction tasks were aggregated to reflect overlapping tasks and identify the maximum construction emissions occurring over the course of Modified Project construction.

In order to provide a conservative analysis, it was assumed that all construction activities would be completed within the minimum timeframe anticipated for construction, which provides for the maximum overlap of construction components within the Modified Project's overall development period as well as the most intense peak daily construction activity for each component of the Modified Project. This is of particular importance as construction emissions are directly related to the duration and intensity of construction activities (i.e., emissions increase as the amount of construction and intensity increases). Emission rates representative of certain stages of construction (i.e., construction worker trips and delivery vehicle trips) would also decrease over time in response to the use of cleaner vehicles or equipment that emit lower levels of pollutants. Detailed construction phasing assumptions are presented in Appendix A.

As shown in Table 2 on page 28, Modified Project emissions of VOC and NO<sub>x</sub> would exceed the SCAQMD regional threshold. However, VOC and NO<sub>x</sub> emissions would remain below those previously reported under the Original Project. All other pollutants remain below their respective SCAQMD regional thresholds and below the previously reported emissions for the Original Project. As such, the Modified Project would not result in any new or substantially increased significant impacts to regional air quality and such impacts would be within the envelope of impacts set forth in the Certified EIR.

When quantifying mass emissions for localized analysis, only emissions that occur on-site are considered. Consistent with the SCAQMD Localized Significance Threshold (LST) methodology guidelines, emissions related to off-site delivery/haul truck activity and employee trips are not considered in the evaluation of localized impacts. As shown in Table 3 on page 30, localized emissions of CO, PM<sub>10</sub>, and PM<sub>2.5</sub> would remain below their respective SCAQMD LST significance thresholds. However, NO<sub>x</sub> emissions would exceed the SCAQMD LST. Therefore, the localized effects from the on-site construction emissions of NO<sub>x</sub> would be potentially significant and mitigation measures are required.

#### *(b) Operation*

Similar to the Original Project, air pollutant emissions associated with occupancy and operation of the Modified Project would be generated by consumption of both electricity and natural gas, and by the operation of on-road vehicles. With the modification to account for student housing and hotel uses, regional emissions were re-evaluated using the most recent version of URBEMIS (URBEMIS 2007). The results of this analysis are shown in Table 4 on page 32.

In comparison to the Original Project, operational emissions for the Modified Project would decrease by 49 lbs/day of CO, 22 lbs/day of NO<sub>x</sub>, 1 lb/day of VOC, and results in similar amounts of SO<sub>x</sub>. However, the Modified Project is expected to result in an increase of 55 lbs/day of PM<sub>10</sub> when compared to the Original Project. However, like the Original Project, regional PM<sub>10</sub> emissions from the Modified Project would be below the applicable significance threshold and the impact from such emissions would be below the applicable significance threshold and the impact from such emissions would be less than significant. The overall reduction in operational emissions of CO, NO<sub>x</sub>, and VOC is a result of the reduced emission factors the latest URBEMIS model uses along with a later buildout year.

The increase in PM<sub>10</sub> emissions is a direct result of additional sources the latest URBEMIS model includes in the emission estimates; specifically, entrained roadway dust from motor vehicle travel on paved roads. Though the Modified Project would result in a reduction in NO<sub>x</sub> emissions in comparison to the Original Project, similar to the Original Project, operation of the Modified Project would exceed the SCAQMD regional threshold for NO<sub>x</sub>. Implementation of the same project design features and mitigation measures as

**Table 2**  
**Modified Project Regional Construction Emissions**  
**(Pounds per Day)**

<b>Emission Source</b>	<b>VOC</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>2.5</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub><sup>a</sup></b>
<b>Modified Project</b>						
Residential Demolition	5	25	43	<1	10	3
Residential Earthwork	16	74	162	<1	33	12
Residential Foundation	6	33	46	<1	2	2
Residential Concrete/Steel/Frame	7	47	50	<1	2	2
Residential Interior/Exterior Finishing	69	54	38	<1	2	2
Residential Landscape/Paving	3	17	20	<1	1	1
Hotel Demolition	4	18	28	<1	4	1
Hotel Earthwork	10	55	99	<1	21	7
Hotel Foundation	5	28	45	<1	2	1
Hotel Concrete/Steel/Frame	7	41	51	<1	2	2
Hotel Interior/Exterior Finishing	71	50	32	<1	2	1
Hotel Landscape/Paving	3	14	17	<1	1	1
HCCIII Demolition	4	25	31	<1	2	2
HCCIII Earthwork	5	31	39	<1	7	3
HCCIII Shoring	3	17	19	<1	1	1
HCCIII Concrete/Steel/Frame	6	36	40	<1	2	2
HCCIII Interior/Exterior Finishing	24	59	32	<1	2	1
HCCIII Landscape/Paving	3	17	20	<1	1	1
HCCIV Demolition	4	25	31	<1	2	2
HCCIV Earthwork	5	31	39	<1	9	3
HCCIV Shoring	3	17	19	<1	1	1
HCCIV Concrete/Steel/Frame	6	36	40	<1	2	2
HCCIV Interior/Exterior Finishing	24	59	32	<1	2	1
HCCIV Landscape/Paving	3	17	20	<1	1	1
<b>Roadway Improvements<sup>b</sup></b>						
Phase 3A.1 Demolition	3	14	24	<1	1	1
Phase 3A.2 Grading	3	18	27	<1	5	2
Phase 3A.3 Paving	2	10	14	<1	1	1
Phase 3A.4 Demolition	3	14	24	<1	1	1
Phase 3A.5 Grading	3	18	27	<1	5	2
Phase 3A.6 Paving	2	9	13	<1	1	1
Phase 3B.1 Demolition	3	14	22	<1	1	1
Phase 3B.2 Grading	3	17	25	<1	4	2
Phase 3B.3 Paving	2	9	13	<1	1	1
Phase 3B.4 Demolition	3	14	22	<1	1	1
Phase 3B.5 Grading	3	17	25	<1	4	2
Phase 3B.6 Paving	2	9	12	<1	1	1
<b>Maximum Concurrent Peak Daily<sup>c</sup></b>	<b>130</b>	<b>236</b>	<b>240</b>	<b>&lt;1</b>	<b>50</b>	<b>18</b>

**Table 2 (Continued)**  
**Modified Project Regional Construction Emissions**  
**(Pounds per Day)**

Emission Source	VOC	CO	NO <sub>x</sub>	SO <sub>2.5</sub>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>a</sup>
<b>Comparison to SCAQMD Thresholds</b>						
Modified Project Emissions	130	236	240	<1	50	18
SCAQMD Significance Threshold	75	550	100	150	150	55
<b>Over/(Under)</b>	55	(314)	140	(150)	(100)	(37)
<b>Comparison to Original Project</b>						
Modified Project Emissions	130	236	240	<1	50	18
Original Project Emissions <sup>d</sup>	144	340	281	1	107	—
<b>Over (Under)</b>	<b>(14)</b>	<b>(104)</b>	<b>(41)</b>	<b>(1)</b>	<b>(64)</b>	<b>—</b>
<p><sup>a</sup> Subsequent to completion of the Certified EIR, the SCAQMD promulgated PM<sub>2.5</sub> regional significance thresholds. As shown above, the Modified Project would result in less than significant regional construction PM<sub>2.5</sub> impacts.</p> <p><sup>b</sup> In order to limit potential impacts during construction of the proposed streetscape improvements, construction is proposed to occur in two primary phases, Phases 3A and 3B.</p> <p><sup>c</sup> Maximum concurrent peak daily emissions of VOC and CO occur when Residential Interior/Exterior Finishing, Hotel Earthwork, HCC III Interior/Exterior Finishing, and HCC IV Interior/Exterior Finishing and Phase 3A.8 Grading phases all overlap. Maximum concurrent peak daily emissions of NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> occur during the Earthwork phases of the Residential element, HCC III, and HCC IV.</p> <p><sup>d</sup> Table 13 on page 211, Section VI.D, Air Quality, of the Draft EIR.</p> <p>Source: Matrix Environmental, 2013.</p>						

the Original Project would reduce the potential air quality impacts of the Modified Project to the extent technically feasible. However, emissions would remain above SCAQMD significance thresholds. Therefore, similar to the Original Project, operation of the Modified Project would have a significant and unavoidable impact on regional air quality for NO<sub>x</sub>. Operational emissions would not exceed the SCAQMD significance thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, and, thus, impacts are concluded to be less than significant for those pollutants. Such impacts would be within the envelope of impacts included in the Certified EIR.

With regard to traffic-related localized air quality impacts, as described further below in Subsection V.O, Traffic, Circulation, and Parking, the Modified Project would result in a slightly reduced number of peak-hour trips compared to the Original Project. Therefore, traffic-related localized air quality impacts would be essentially the same for the Modified Project as for the Original Project. Since the localized CO hotspot analysis for the Original Project did not result in any significant impacts, the Modified Project would likewise not have any localized impacts.

**Table 3  
Modified Project Localized Construction Emissions  
(Pounds per Day)**

<b>Emission Source</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub><sup>a</sup></b>
<b>Modified Project</b>				
Residential Demolition	18	28	9	2
Residential Earthwork	40	72	30	9
Residential Foundation	16	23	1	1
Residential Concrete/Steel/Frame	16	26	1	1
Residential Interior/Exterior Finishing	17	27	2	1
Residential Landscape/Paving	12	17	1	1
Hotel Demolition	14	25	3	1
Hotel Earthwork	29	48	19	6
Hotel Foundation	13	19	1	1
Hotel Concrete/Steel/Frame	15	24	1	1
Hotel Interior/Exterior Finishing	12	18	1	1
Hotel Landscape/Paving	11	15	1	1
HCCIII Demolition	14	27	2	1
HCCIII Earthwork	20	32	7	3
HCCIII Shoring	9	18	1	1
HCCIII Concrete/Steel/Frame	18	30	2	1
HCCIII Interior/Exterior Finishing	12	20	1	1
HCCIII Landscape/Paving	12	17	1	1
HCCIV Demolition	14	27	2	1
HCCIV Earthwork	20	32	9	3
HCCIV Shoring	9	18	1	1
HCCIV Concrete/Steel/Frame	18	30	2	1
HCCIV Interior/Exterior Finishing	12	20	1	1
HCCIV Landscape/Paving	12	17	1	1
<b>Roadway Improvements</b>				
Phase 3A.1 Demolition	10	19	1	1
Phase 3A.2 Grading	14	22	4	2
Phase 3A.3 Paving	7	11	1	1
Phase 3A.4 Demolition	10	19	1	1
Phase 3A.5 Grading	14	22	4	2
Phase 3A.6 Paving	7	10	1	1
Phase 3B.1 Demolition	10	17	1	1
Phase 3B.2 Grading	14	21	4	2
Phase 3B.3 Paving	7	10	1	1
Phase 3B.4 Demolition	10	17	1	1
Phase 3B.5 Grading	14	21	4	2
Phase 3B.6 Paving	7	9	1	1
<b>Maximum Concurrent Peak Daily<sup>b</sup></b>	<b>80</b>	<b>135</b>	<b>46</b>	<b>15</b>

**Table 3 (Continued)**  
**Modified Project Localized Construction Emissions**  
**(Pounds per Day)**

Emission Source	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>a</sup>
<b>Comparison to SCAQMD LSTs</b>				
Modified Project Emissions	<b>80</b>	<b>135</b>	<b>46</b>	<b>15</b>
SCAQMD Significance Threshold <sup>c</sup>	3,188	68	68	21
<b>Over/(Under)</b>	(3,108)	67	(23)	(6)
<p><sup>a</sup> Subsequent to completion of the Certified EIR, the SCAQMD promulgated PM<sub>2.5</sub> localized significance thresholds. As shown above, the Modified Project would result in less than significant localized construction PM<sub>2.5</sub> impacts.</p> <p><sup>b</sup> Maximum concurrent peak daily emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> occur during the Earthwork phases of the Residential element, HCC III, and HCC IV.</p> <p><sup>c</sup> SCAQMD LSTs based on SRA 1, 5-acre active site area, and 110-meter receptor distance. The SCAQMD localized threshold for NO<sub>x</sub> was revised to account for the recently adopted 1-hour NO<sub>2</sub> NAAQS of 188 µg/m<sup>3</sup> or an incremental threshold of 46 µg/m<sup>3</sup> for SRA 1.</p> <p>Source: Matrix Environmental, 2013.</p>				

The Modified Project would also be subject to the SCAQMD's Air Quality Management Plan (AQMP). A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in its development. The most recent AQMP adopted by the SCAMQD incorporates SCAG's 2008 Regional Transportation Plan (RTP) socioeconomic forecast projections of regional population and employment growth. As discussed below under Section V.L, Population and Housing, the Modified Project would result in an increase of 447 beds. Using the number of beds as a surrogate for population, the Modified Project's increase in population would represent approximately 0.011 percent of the City of Los Angeles Subregion's forecasted population growth for 2014. Additionally, the Modified Project is expected to result in an increase of approximately 343 jobs associated with the proposed hotel uses. This would represent approximately 0.77 percent of the City of Los Angeles Subregion's forecasted employment growth for 2014. Such levels of population and employment growth are consistent with the forecasts for the Subregion as adopted by SCAG. Because the SCAQMD is expected to incorporate these same projections into the AQMP, it can be concluded that the Modified Project would be consistent with the projections in the AQMP. For comparison purposes, the Original Project included an increase of approximately 487 jobs, 144 jobs more than the Modified Project.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The CARB has published and adopted the "Air Quality and Land Use Handbook: A Community Health Perspective (2005)," which provides

**Table 4  
Modified Project Operation Emissions  
(Pounds per Day)**

Emission Source	VOC	CO	NO <sub>x</sub>	SO <sub>2.5</sub>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>a</sup>
<b>Original Project<sup>b</sup></b>						
Mobile Sources	44	479	59	<1	64	--
Stationary Sources <sup>c</sup>	1	7	42	3	1	--
Miscellaneous Sources	1	10	2	<1	1	--
<b>Total</b>	<b>46</b>	<b>496</b>	<b>103</b>	<b>3</b>	<b>66</b>	<b>--</b>
<b>Modified Project</b>						
Mobile Sources	38	436	57	<1	120	23
Stationary Sources	<1	3	19	2	1	1
Area Sources	7	8	5	1	<1	<1
<b>Total</b>	<b>45</b>	<b>447</b>	<b>81</b>	<b>3</b>	<b>121</b>	<b>24</b>
<b>Difference (Net) Emissions</b>	<b>(1)</b>	<b>(49)</b>	<b>(22)</b>	<b>0</b>	<b>55</b>	<b>--</b>
<b>Comparison to SCAQMD Threshold</b>						
Modified Project Emissions	45	447	81	3	121	24
SCAQMD Significance Threshold	55	550	55	150	150	55
<b>Over (Under)</b>	<b>(10)</b>	<b>(103)</b>	<b>26</b>	<b>(147)</b>	<b>(29)</b>	<b>(31)</b>
<p><sup>a</sup> Subsequent to completion of the Certified EIR, the SCAQMD promulgated PM<sub>2.5</sub> significance thresholds. As shown above, the Modified Project would result in less than significant PM<sub>2.5</sub> impacts.</p> <p><sup>b</sup> Table 14 on page 218, Section VI.D, Air Quality, of the Draft EIR.</p> <p><sup>c</sup> Stationary sources under the Original Project include electricity and natural gas usage. Under the Modified Project, emissions from natural gas usage are included as an area source.</p> <p>Source: Matrix Environmental, 2013.</p>						

recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The SCAQMD adopted similar recommendations in their “*Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005)*.” Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources, and the addition of new TAC sources in proximity to existing sensitive land uses.

Based on CARB siting recommendations, sensitive receptors should not be sited within 1,000 feet of a warehouse distribution center or rail yard (which have extensive heavy-duty truck activity), within 500 feet of a freeway (or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day), or within

300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations. The residential units included as part of the Modified Project would not be located within the above described distances to any of these sources of TACs. Therefore, the Modified Project would not result in any air toxic impacts and such impacts would be within the envelope of impacts analyzed in the Certified EIR.

(c) *Greenhouse Gas Emissions*

Until the passage of AB 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. Rather, the primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the California and federal Clean Air Acts as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents now contain a more detailed analysis of GHG emissions. However, the analysis of GHGs is different from the analysis of criteria pollutants. Since the half-life of CO<sub>2</sub> is approximately 100 years, GHGs affect the global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions; and the determination of attainment or non-attainment are based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures).

In its January 2008, CEQA and Climate Change white paper, the California Air Pollution Control Officers Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, the CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. One of the potential approaches identified in the CAPCOA white paper, Threshold 1.1, would require a project to meet a percent reduction target. This target would be based on the average reduction from “business-as-usual” emissions identified by CARB as necessary to satisfy AB 32’s mandate of returning to 1990 levels of GHG emissions by 2020. CARB has calculated the necessary reduction to be approximately 16 percent from “business-as-usual.”<sup>8</sup>

Subsequent to the completion of the Original Project’s Certified EIR, the state’s Office of Planning and Research’s recommended amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009. Analysis of GHG emissions in a CEQA document presents unique challenges to lead agencies. However, such analysis must be consistent with existing CEQA principles and, therefore, the amendments comprise relatively modest changes to various portions of the existing CEQA Guidelines. The amendments add no additional substantive requirements; rather, the

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<sup>8</sup> CARB, *Supplement to the AB 32 Scoping Plan FED, Table 1.2-2, Updated 2020 Business-as-Usual Emissions Forecast*, [www.arb.ca.gov/cc/scopingplan/document/final\\_supplement\\_to\\_sp\\_fed.pdf](http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf).



Guidelines merely assist lead agencies in complying with CEQA's existing requirements. Modifications address those issues where analysis of GHG emissions may differ in some respects from more traditional CEQA analysis. Other modifications clarify existing law that may apply both to an analysis of GHG emissions as well as more traditional CEQA analyses.

As shown in Table 5 on page 35, the Modified Project would result in an annual total of 15,399 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e). This would represent an approximate 27 percent reduction over the "business-as-usual" scenario. This reduction is a direct result of applying required conservation measures for new buildings per the City of Los Angeles "Green Building" ordinance. Some key mandatory measures included in the City of Los Angeles "Green Building" ordinance include the following:

- Construction—Construction waste reduction of at least 50 percent;
- Construction—100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled;
- Transportation Demand—Provide secure bicycle parking for 5 percent of motorized vehicle parking capacity;
- Transportation Demand—Provide designated parking for any combination of low-emitting, fuel-efficient, and carpool/van pool vehicles;
- Energy Conservation—Provide electric vehicle supply wiring for a minimum of 5 percent of the total number of parking spaces;
- Energy Conservation—A project must exceed the CEC requirement based on the 2008 Energy Efficiency Standards by 15 percent using an Alternative Calculation Method (ACM) approved by the CEC;
- Energy Conservation—Each appliance provided and installed shall meet Energy Star if an Energy Star designation is applicable for that appliance;
- Renewable Energy—Provide future access, off-grid pre-wiring, and space for electrical solar systems;
- Water—A schedule of plumbing fixtures and fixture fittings shall be provided that will reduce the overall use of potable water within the building by at least 20 percent, based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code; and
- Wastewater—Each building shall reduce wastewater by 20 percent based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code.

**Table 5**  
**Annual GHG Emissions Summary**  
**(Metric Tons of Carbon Dioxide Equivalent)**

Scope	“Business-as-Usual” Project	Project	Project’s Break from “Business-as-Usual”
Mobile Source	17,771	12,320	31%
Electricity Usage	1,332	1,154	13%
Natural Gas Usage	2,022	1,747	14%
Water Usage/Wastewater Generation	368	294	20%
Solid Waste	162	162	0%
Construction	201	201	0%
<b>Total</b>	<b>21,857</b>	<b>15,879</b>	<b>27%</b>
<i>Source: Matrix Environmental, 2013.</i>			

As such, the Modified Project is expected to result in less than significant impacts related to GHG emissions.

### 3. Mitigation Measures

The mitigation measures set forth in the MMRP included in the Certified EIR and provided below remain applicable to the Modified Project. An additional mitigation measure is also provided below to address potentially significant impacts associated with localized emissions from construction of the Modified Project.

#### *(a) Construction*

**Mitigation Measure D-1:** General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.7

**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.

**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.

**Mitigation Measure D-9:** All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by the California Air Resources Board. Any emissions control device used by the contractor shall achieve emissions reduction that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations.

*(b) Operation*

**Mitigation Measure D-910:** 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-1011:** 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-1112:** 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.

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, as shown in Table 6 on page 37, based on SCAQMD screening thresholds, the Modified Project would remain in exceedance of the SCAQMD localized significance threshold for NO<sub>x</sub> during the most intense construction period. Therefore, the localized effects from the on-site construction emissions of NO<sub>x</sub> were analyzed using the AERMOD dispersion model. The results of the dispersion modeling show that the maximum concentrations of NO<sub>2</sub> at an off-site sensitive receptor would occur at Hazard Park, just south of the Project Site. The maximum state and federal

**Table 6**  
**Mitigated Modified Project Localized Construction Emissions**  
**(Pounds per Day)**

<b>Emission Source</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub><sup>a</sup></b>
<b>Modified Project</b>				
Residential Demolition	18	12	8	1
Residential Earthwork	40	32	19	4
Residential Foundation	16	14	0	0
Residential Concrete/Steel/Frame	16	15	0	0
Residential Interior/Exterior Finishing	17	16	0	0
Residential Landscape/Paving	12	8	0	0
Hotel Demolition	14	10	2	0
Hotel Earthwork	29	21	12	3
Hotel Foundation	13	12	0	0
Hotel Concrete/Steel/Frame	15	14	0	0
Hotel Interior/Exterior Finishing	12	11	0	0
Hotel Landscape/Paving	11	7	0	0
HCCIII Demolition	14	11	1	0
HCCIII Earthwork	20	14	4	1
HCCIII Shoring	9	11	0	0
HCCIII Concrete/Steel/Frame	18	17	0	0
HCCIII Interior/Exterior Finishing	12	12	0	0
HCCIII Landscape/Paving	12	8	0	0
HCCIV Demolition	14	11	1	0
HCCIV Earthwork	20	14	5	1
HCCIV Shoring	9	11	0	0
HCCIV Concrete/Steel/Frame	18	17	0	0
HCCIV Interior/Exterior Finishing	12	12	0	0
HCCIV Landscape/Paving	12	8	0	0
<b>Roadway Improvements</b>				
Phase 3A.1 Demolition	10	12	0	0
Phase 3A.2 Grading	14	13	2	1
Phase 3A.3 Paving	7	5	0	0
Phase 3A.4 Demolition	10	12	0	0
Phase 3A.5 Grading	14	13	2	1
Phase 3A.6 Paving	7	5	0	0
Phase 3B.1 Demolition	10	11	0	0
Phase 3B.2 Grading	14	12	2	1
Phase 3B.3 Paving	7	5	0	0
Phase 3B.4 Demolition	10	11	0	0
Phase 3B.5 Grading	14	12	2	1
Phase 3B.6 Paving	7	5	0	0
<b>Maximum Concurrent Peak Daily<sup>b</sup></b>	<b>80</b>	<b>72</b>	<b>27</b>	<b>6</b>

**Table 6 (Continued)**  
**Mitigated Modified Project Localized Construction Emissions**  
**(Pounds per Day)**

Emission Source	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>a</sup>
<b>Comparison to SCAQMD LSTs</b>				
Modified Project Emissions	<b>80</b>	<b>72</b>	<b>27</b>	<b>6</b>
SCAQMD Significance Threshold <sup>c</sup>	3,188	68	68	21
<b>Over/(Under)</b>	(3,108)	4	(41)	(15)
<p><sup>a</sup> Subsequent to completion of the Certified EIR, the SCAQMD promulgated PM<sub>2.5</sub> localized significance thresholds. As shown above, the Modified Project would result in less than significant localized construction PM<sub>2.5</sub> impacts.</p> <p><sup>b</sup> Maximum concurrent peak daily emissions of CO, PM<sub>10</sub>, and PM<sub>2.5</sub> occur during the Earthwork phases of the Residential element, HCC III, and HCC IV. Maximum concurrent peak daily emissions of NO<sub>x</sub> occur during the Residential Concrete/Steel/Frame, HCC III Shoring, HCC III Concrete/Steel/Frame, HCC IV shoring, and HCC IV Concrete/Steel/Frame.</p> <p><sup>c</sup> SCAQMD LSTs based on SRA 1, 5-acre active site area, and 110-meter receptor distance. The SCAQMD localized threshold for NO<sub>x</sub> was revised to account for the recently adopted 1-hour NO<sub>2</sub> NAAQS of 188 µg/m<sup>3</sup> or an incremental threshold of 46 µg/m<sup>3</sup> for SRA 1.</p> <p>Source: Matrix Environmental, 2013.</p>				

1-hour concentrations observed within the park boundaries are 39.05 µg/m<sup>3</sup> and 29.58 µg/m<sup>3</sup>, respectively. The maximum annual concentration predicted to occur is 0.63 µg/m<sup>3</sup>. Similar to the Original Project, and as shown in Table 7 on page 39, all of these maximum concentrations would remain below the state and federal ambient air quality standards at off-site sensitive receptors (see Appendix A). Additionally, due to a reduction in emission factors since the time of the Original Project's analysis, the Modified Project would reduce the significant and unavoidable impacts to localized PM<sub>10</sub> emissions to less than significant. As such, localized impacts that may result from air pollutant emissions during the construction phases would be less than significant.

## D. Biological Resources

### 1. Original Project Impacts

The Project Site is located in an urbanized location developed primarily with surface parking, ornamental trees, and landscaping designed as amenities to the streetscape, rather than as natural habitat. In addition, the Project Site is not located in or adjacent to any riparian area and is not identified in the City of Los Angeles General Plan as a natural, conservation, or open space resource. Additionally, no other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved, local, regional, or state habitat conservation plan applies to the Project Site. Furthermore, the Project Site does not contain any natural hydrologic features or federally protected wetlands as defined by

**Table 7**  
**Maximum Ambient Construction Pollutant Impacts**  
**( $\mu\text{g}/\text{m}^3$ )**

Pollutant	Maximum Off-Site Concentration
<b>NO<sub>2</sub>—1-hr Concentration</b>	
Maximum Increment (CAAQS)	39.1
CAAQS Background	226.2
CAAQS Background + Increment	265.3
SCAQMD Threshold	339
Significant Impact?	No
Maximum Increment (NAAQS)	29.6
NAAQS Background	141.9
NAAQS Background + Increment	171.5
SCAQMD Threshold	188
Significant Impact?	No
<b>NO<sub>1</sub>—Annual Concentration</b>	
Maximum Increment	0.63
Background	52.83
Background + Increment	53.45
SCAQMD Threshold	57
Significant Impact?	No
<i>Source: Matrix Environmental, 2013.</i>	

Section 404 of the Clean Water Act. In addition, any street trees requiring removal would occur in accordance with the City of Los Angeles Street Tree Division requirements. Lastly, the Project Site does not function as a wildlife corridor and no bodies or courses of water exist on-site to provide habitat for fish. Based on the above, the Project Site does not contain any notable natural features or natural habitat for species identified as candidate, sensitive, or of special status. As set forth in the Certified EIR, overall, no impacts to biological resources would occur, and no mitigation measures are necessary.

The surrounding area features Hazard Park, a 25-acre recreational resource, which has the potential to contain 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. Specifically, while Development Site A (the portion of the Project Site nearest to Hazard Park) and the park are located at opposite corners of the San Pablo Street/Eastlake Avenue 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 intervening ornamental landscaping. 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 Hazard Park, the Project would not have an impact on any species that may inhabit Hazard Park.

## 2. Modified Project Impacts

As described above, there are no notable natural features or natural habitat for species identified as candidate, sensitive, or of special status within the HSC. In addition, as with the Original Project, removal of any street trees under the Modified Project would occur in accordance with the City of Los Angeles Street Tree Division requirements. Furthermore, removal of any on-site mature trees, which could potentially provide nesting sites for migratory birds, would be conducted in accordance with the Migratory Bird Treaty Act (MBTA) and the California Department of Fish and Game (CDFG) Code. Therefore, similar to the Original Project, the Modified Project would not result in impacts to biological resources, and no mitigation measures would be necessary. Such impacts would be within the envelope of impacts addressed in the Certified EIR.

## E. Cultural Resources

### 1. Original Project Impacts

As discussed in the Certified EIR, none of the Development Sites contain any extant buildings, structures, objects, sites, or districts with any historical associations or significance necessary for California Register eligibility. Thus, the Project Site does not contain any historical resources as defined by the CEQA Guidelines. As such, the Certified EIR determined that no adverse impacts to significant historical resources would occur, and no mitigation measures are necessary.

As the Project Site is located within an urbanized area and has been subject to disturbance due to grading and development activities in the past, any surficial archaeological resources that may have existed on the site at one time are likely to have been disturbed or removed previously. In addition, as discussed in the Certified EIR, a records search conducted by the South Central Coastal Information Center of the California Historical Resources Information System reported no historic or prehistoric archaeological sites on the Project Site or within the HSC. Moreover, no unique paleontological or unique geologic resources have been identified on any of the Development Sites or in the surrounding area. Additionally, no human remains are known to be present. Any discovery of archaeological and paleontological resources and human remains during construction of the Project would be treated in accordance with federal, state, and local guidelines, as

appropriate. As such, any impacts are expected to be less than significant, and no mitigation measures are necessary.

## 2. Modified Project Impacts

As noted above, the Modified Project would continue to be developed within the HSC. As described above, there are no known historic resources within the Project Site. Therefore, similar to the Original Project, no direct impacts to historical resources would result from the Modified Project. In addition, as the Project Site is located within an urbanized area and has been subject to disturbance due to grading and development activities in the past, the potential for Project-related ground-disturbing activities to encounter archaeological and paleontological resources and human remains would be low. In addition, similar to the Original Project, any uncovering of archaeological and paleontological resources and human remains under the Modified Project would be treated in accordance with federal, state, and local guidelines, as appropriate. Therefore, as with the Original Project, potential impacts to cultural resources would be less than significant with the Modified Project. Such impacts would be within the envelope of impact addressed in the Certified EIR.

## F. Geology and Soils

### 1. Original Project Impacts

As set forth in the Certified EIR, no known active faults pass through any of the Development Sites, nor are any of the Development Sites within an Alquist-Priolo Earthquake Fault Zone. However, the Project Site could be subject to moderate to strong ground shaking typical of the general southern California area. Therefore, development associated with the Original Project could result in the potential exposure of people and structures to ground shaking in the event of an earthquake. With adherence to applicable seismic standards, safety requirements and construction specifications, potential impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are necessary.

As indicated in the Certified EIR, the type and consistency of the soils and underlying bedrock as well as the extensive geologic history of the Project Site are such that the Original Project would not be expected to experience liquefaction or similar seismic ground failure. In addition, the probability of seismically-induced landslides occurring within the Project Site is remote. Furthermore, detailed geotechnical investigations that would be required in support of the City's issuance of grading and building permits and adherence to applicable safety requirements and construction specifications would identify and remedy any adverse conditions attributable to the presence of unstable/expansive soils. In addition, as Project development would not result in the substantial loss of topsoil and



construction activities would occur in accordance with applicable state and local regulations governing grading and site design, the Original Project is not expected to cause substantial soil erosion. As such, any impacts associated with landslides, liquefaction, unstable/expansive soils, and soil erosion would be less than significant, and no mitigation measures are necessary.

## 2. Modified Project Impacts

The analysis of potential impacts associated with Project Site geology and soils provided below is based in part on information contained in the Certified EIR and in a Geotechnical Engineering Investigation prepared by Geotechnologies, Inc. dated December 22, 2011, and provided as Appendix B of this Addendum.

As described above, no known active faults pass through any of the Development Sites and none of the Development Sites are within an Alquist-Priolo Earthquake Fault Zone. Nonetheless, as with the Original Project, implementation of the Modified Project could result in the potential exposure of people and structures to ground shaking in the event of an earthquake. However, similar to the Original Project, the Modified Project would adhere to applicable seismic standards, safety requirements, and construction specifications. With implementation of these regulatory requirements, the Modified Project's impacts associated with the exposure of on-site populations, property, or structures to seismic hazards would be less than significant, and no mitigation measures are necessary.

Geological conditions of the Development Sites have remained substantially the same since preparation of the Certified EIR. Therefore, similar to the Original Project, development within these sites would also not result in liquefaction or landslides hazards that would expose people, property, or structures to an increased risk of hazard or damage. However, the streetscape improvements proposed along San Pablo Street, Alcazar Street, Eastlake Avenue, and Norfolk Street may be within or adjacent of a potentially liquefiable area.<sup>9,10</sup> However, the Modified Project would comply with City of Los Angeles Building Code requirements pertaining to development within areas susceptible to liquefaction and with the California Geological Survey Special Publication 117, which provides guidelines for

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<sup>9</sup> California Division of Mines and Geology, *State of California Seismic Hazard Zones, Los Angeles Quadrangle, March 25, 1999*. Available at [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_la.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_la.pdf); accessed November 8, 2011.

<sup>10</sup> *Los Angeles General Plan Safety Element, Exhibit B, Areas Susceptible to Liquefaction, page 49 (November 1996)*.

evaluating and mitigating seismic hazards in California.<sup>11</sup> In addition, similar to the Original Project, the Modified Project would adhere to applicable safety requirements and construction specifications to remedy any adverse conditions attributable to the presence of unstable/expansive soils. Furthermore, as with the Original Project, the Modified Project would implement appropriate construction techniques to reduce any potential impacts associated with erosion. Additionally, detailed site-specific geotechnical studies that would be required in support of the City's issuance of grading and building permits would further minimize potential geological impacts. As such, similar to the Original Project, potential impacts associated with geology and soils under the Modified Project would also be less than significant and within the envelope of the impact analysis set forth in the Certified EIR.

## **G. Hazards and Hazardous Materials**

### **1. Original Project Impacts**

As discussed in the Certified EIR, potential hazards and hazardous materials impacts associated with the Original Project would primarily be limited to the use of potentially hazardous materials during construction and operation. Specifically, construction of the Original Project may include the use of paints, cleaning materials, vehicle fuels, oils, and transmission fluids. During operation, the Original Project could use medical hazardous materials and generate medical hazardous waste typical of medical clinic uses. Additionally, the Project may include nuclear medicine, which would involve the use of very small amounts of radioactive materials or radiopharmaceuticals for diagnosis and treatment of diseases. The Original Project may also generate limited quantities of hazardous materials associated with the routine use of the proposed parking facilities (e.g., leaks of engine oil, transmission fluid from vehicles). However, all potentially hazardous materials used during construction and operation would be contained, stored, used, and disposed of in accordance with all applicable federal, state, and local laws, regulations, and standards. In addition, the Original Project would be required to prepare an emergency response and evacuation plan, conduct hazardous materials training, and notify employees who work in the vicinity of hazardous materials, in accordance with federal OSHA and Cal OSHA requirements. Based on the preceding, the Original Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, no upset or accident is reasonably foreseen that would involve the creation of a significant hazard through the release of hazardous materials into the environment. As such, impacts would be less than significant, and no mitigation measures are necessary.

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<sup>11</sup> *California Department of Conservation, California Geological Survey, Seismic Hazards Zonation Program Laws and Guidelines. Available at [www.conservation.ca.gov/cgs/shzp/Pages/SHMPpgminfo.aspx](http://www.conservation.ca.gov/cgs/shzp/Pages/SHMPpgminfo.aspx); accessed November 9, 2011.*

Any adverse conditions that are identified during the regulatory permitting and construction process for the Original Project associated with the inclusion of the HSC on lists of hazardous material sites compiled pursuant to Government Code Section 65962.5 would be satisfactorily addressed and mitigated to a less than significant level via compliance with applicable standards and regulations and no mitigation measures are necessary.

Implementation of the Original Project would not result in the closure of any street, particularly those designated as an evacuation route in an adopted emergency response or evacuation plan. To the extent feasible, construction activities and staging areas would not physically block any streets or impair access to and around the HSC or any adjacent properties. The proposed buildings would be designed to conform to the standards of the Los Angeles Fire Department for emergency egress and would be integrated into the existing HSC emergency response and evacuation plans. As such, potential impacts to adopted emergency response or evacuation plans would be less than significant, and no mitigation measures are necessary.

## 2. Modified Project Impacts

The following analysis addresses the Modified Project's potential impacts with regard to hazards and hazardous materials and is based in part upon information provided in the Certified EIR and in the Phase I Environmental Site Assessment prepared by California Environmental Geologists and Engineers, Inc., dated January 2012, and provided as Appendix C of this Addendum.

As excavation and earthwork activities under the Modified Project would be similar to those of the Original Project, the potential to release contaminants during these phases of construction would be generally the same as under the Modified Project. The Modified Project may result in additional construction activities compared to the Original Project due to increased development under Option 1. As such, the Modified Project may result in an increase in the handling and storage of hazardous materials during construction. Furthermore, as described in detail in Appendix C of this Addendum, it is possible that development of the Modified Project could encounter contaminated soil or underground features such as underground storage tanks associated with previous uses of the Project Site and the inclusion of the HSC on lists of hazardous material sites. However, with compliance with applicable standards and regulations and implementation of recommendations provided in the site-specific environmental site assessment, any potential hazards and hazardous materials impacts would be satisfactorily addressed and mitigated to a less than significant level. Therefore, the Modified Project would not create any new impacts with respect to hazardous materials during construction or would increase the severity of any previously identified impacts. Such impacts would be within the envelope of impacts provided in the Certified EIR.

As previously described, the Original Project provided for the construction of additional academic and medical-related floor area and parking facilities within the Project Site. In addition to these types of uses, the Modified Project would include the development of housing and hotel uses which would involve the limited use of hazardous materials typical of those used for such development. Specifically, the hotel and residential uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and pesticides for landscaping. Therefore, the change in land uses would not result in the use of more hazardous materials within the HSC. Notwithstanding, as with the Original Project, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. As such, the change in land uses that would occur under the Modified Project would not create any new impacts with respect to hazardous materials during operation, nor would the Modified Project increase the severity of any previously identified impacts. Thus, as with the Original Project, hazards and hazardous materials impacts during operation would be less than significant under the Modified Project. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

Additionally, as with the Original Project, the proposed streetscape improvements would not physically block any streets, result in the full closure of any street, or impair access to and around the HSC or any adjacent properties. Specifically during construction, one traffic lane in each direction and at least one sidewalk would remain available at all times. Therefore, similar to the Original Project, potential impacts to adopted emergency response or evacuation plans would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts provided in the Certified EIR.

## **H. Surface Hydrology and Water Quality, and Groundwater**

### **1. Original Project Impacts**

#### *(a) Hydrology*

As described above, construction of the Original Project would involve the demolition and removal of six surface parking lots and one vacant lot within the existing HSC. Replacement of these existing primarily impervious surfaces with proposed buildings would not substantially increase the amount of impervious cover that currently exists. As such, the amount of surface runoff would not substantially increase and the existing drainage pattern of the site would not be altered. In addition, in accordance with National Pollutant Discharge Elimination System (NPDES) permit requirements, a Standard Urban Stormwater Management Plan (SUSMP) would be implemented, which would ensure that post-development peak stormwater runoff discharge rates would not exceed the estimated

pre-development rates such that there would be an increased potential for downstream runoff. Furthermore, surface runoff would continue to be captured by existing drainage systems and any new drainage systems that may be installed to support development. Therefore, as the Project Site is currently impervious and would continue to be with implementation of the Original Project, the Original Project would not result in a substantial alteration to the existing drainage pattern or an increase in the rate or amount of on- or off-site surface runoff which could result in flooding, erosion, or siltation. Thus, impacts to hydrology would be less than significant, and no mitigation measures would be necessary.

The Project Site is not located within a 100-year flood plain or within an inundation area associated with the failure of a levee or dam. Therefore, the Original Project would not result in significant impacts associated with flood flows, and no mitigation measures are necessary.

*(b) Surface Water Quality*

An increase in urban contaminants may be expected from the increase in parking facilities on Development Site C and possibly Development Site D. However, the Original Project would be required to comply with state and local regulations governing water quality standards and waste discharge requirements associated with construction and operation of the facilities associated with the Original Project. In addition, as part of the Original Project, SUSMP requirements would be implemented, which may include, but not be limited to: minimizing stormwater pollutants of concern; providing storm drain system stenciling and signage; containing properly designed outdoor material storage areas; containing properly designed trash storage areas; and providing proof of ongoing BMP maintenance. As such, the Original Project would result in less than significant impacts to water quality, and no mitigation measures would be necessary.

*(c) Groundwater*

The water needs of the Original Project would be met 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. In addition, the HSC is mostly developed and contains minimal amounts of pervious surfaces that allow water infiltration. Furthermore, as noted above, the Original Project would replace existing impervious surfaces with new impervious surfaces. Therefore, the Original Project would not result in an increase of impervious area, which could marginally reduce percolation and result in a reduction in groundwater recharge. As such, groundwater impacts would be less than significant and no mitigation measures are necessary.

## 2. Modified Project Impacts

### *(a) Hydrology*

As described above, the seven Development Sites include six surface parking lots and one vacant lot within the existing HSC. In addition, the area of the streetscape improvements is developed with roadways and sidewalks, street lights, utility poles, and limited ornamental landscaping in the form of trees and shrubs. Thus, the Project Site is comprised almost entirely of impervious surfaces. The Modified Project would replace these existing primarily impervious surfaces with new impervious surfaces as well as additional landscaping. Therefore, with the implementation of this additional landscaping, the rate and amount of stormwater runoff would decrease slightly under the Modified Project compared to the Original Project and would continue to be captured by the existing storm drain infrastructure or any new drainage system that may be installed as part of the Modified Project. Thus, development of the Modified Project would not result in an increase in the amount of impervious surface which could contribute additional runoff. Therefore, as with the Original Project, the Modified Project would result in less than significant impacts to hydrology. Such impacts would be within the envelope of impact analysis addressed in the Certified EIR.

### *(b) Surface Water Quality*

As with the Original Project, continued compliance with NPDES requirements and local regulations that include BMPs would ensure that construction activities associated with the Modified Project would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles Regional Water Quality Control Board or other regulatory agencies or impair the beneficial uses of the receiving waters. In addition, construction of the Modified Project would not result in a violation of any water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality. Therefore, as with the Original Project, construction-related impacts to surface water quality would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts addressed in the Certified EIR.

Similar to the Original Project, pollutants typically associated with urban uses, such as oil and grease, metals, fertilizers, pesticides, dirt from landscaped areas, and litter, would be produced during operation of the Modified Project. However, it is anticipated that with the additional landscaping to be provided by the Modified Project, the amount of pervious area would be increased within the HSC. Therefore, the Modified Project would result in a reduced potential for urban pollutants to be conveyed into nearby storm drains during stormwater events. In addition, similar to the Original Project, the Modified Project would be required to comply with SUSMP requirements during the operational life of the Project. Such requirements would include source control BMPs, treatment control BMPs,

and requirements regarding erosion control. Therefore, as with the Original Project, with compliance with such requirements, impacts to surface water quality during operation would be less than significant under the Modified Project. Such impacts would be within the envelope of impact analysis provided in the Certified EIR.

*(c) Groundwater*

As noted above, the Modified Project would replace existing primarily impervious surfaces with new impervious surfaces and additional landscaping. Therefore, as with the Original Project, the Modified Project would also not result in an increase of impervious area which could marginally reduce percolation and result in a reduction in groundwater recharge. Thus, impacts to groundwater hydrology would be less than significant and within the envelope of impact analysis addressed in the Certified EIR.

Based on the Geotechnical Engineering Investigation included as Appendix B of this Addendum, minor to moderate seepage of groundwater was encountered at depths between 12 and 24 feet below the existing site grade of Development Site E. In addition, according to the California Geological Survey Seismic Hazard Zone Report, the historically highest groundwater level is on the order of 25 feet below grade. Furthermore, water seepage was encountered at depths between 5 and 14½ feet under a prior geotechnical investigation conducted in 2002. Construction activities for the Modified Project could require excavation of up to 30 feet below ground surface for development of the HCC IV. Therefore, there is a possibility that, during excavation activities, some seepage will be encountered and dewatering may be necessary. As indicated in Appendix B, it is anticipated that any seepage encountered could be mitigated on an as-encountered basis through the use of small channels at the base of the excavations leading to temporary sump pits, or to the lower end of the site. In addition, any discharge of groundwater during construction of the Modified Project would occur pursuant to, and comply with, the applicable NPDES permit requirements. Furthermore, the Modified Project would also comply with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous materials to effectively reduce the potential for the construction of the Modified Project to release contaminants into groundwater. As such, construction activities associated with the Modified Project would not degrade groundwater quality, and impacts would be less than significant. Such impacts would be within the envelope of impacts identified in the Certified EIR.

## **I. Land Use and Planning**

### **1. Original Project Impacts**

The Project Site is subject to the land use plans and policies of the City of Los Angeles General Plan Framework, the Northeast Los Angeles Community Plan

(Community Plan), and the Adelante Eastside Redevelopment Plan. Regional plans governing planning and land use issues at the Project Site include the SCAG Regional Comprehensive Plan and Guide, the Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Plan, and the SCAQMD Air Quality Management Plan (AQMP). In addition, the Project Site is subject to the provisions of the City of Los Angeles Zoning Code, Chapter 1 of the City of Los Angeles Municipal Code (LAMC), which, in part, facilitates implementation of Community Plan objectives through land use designations and development standards. A summary of the Original Project's consistency with these applicable plans and policies is provided below.

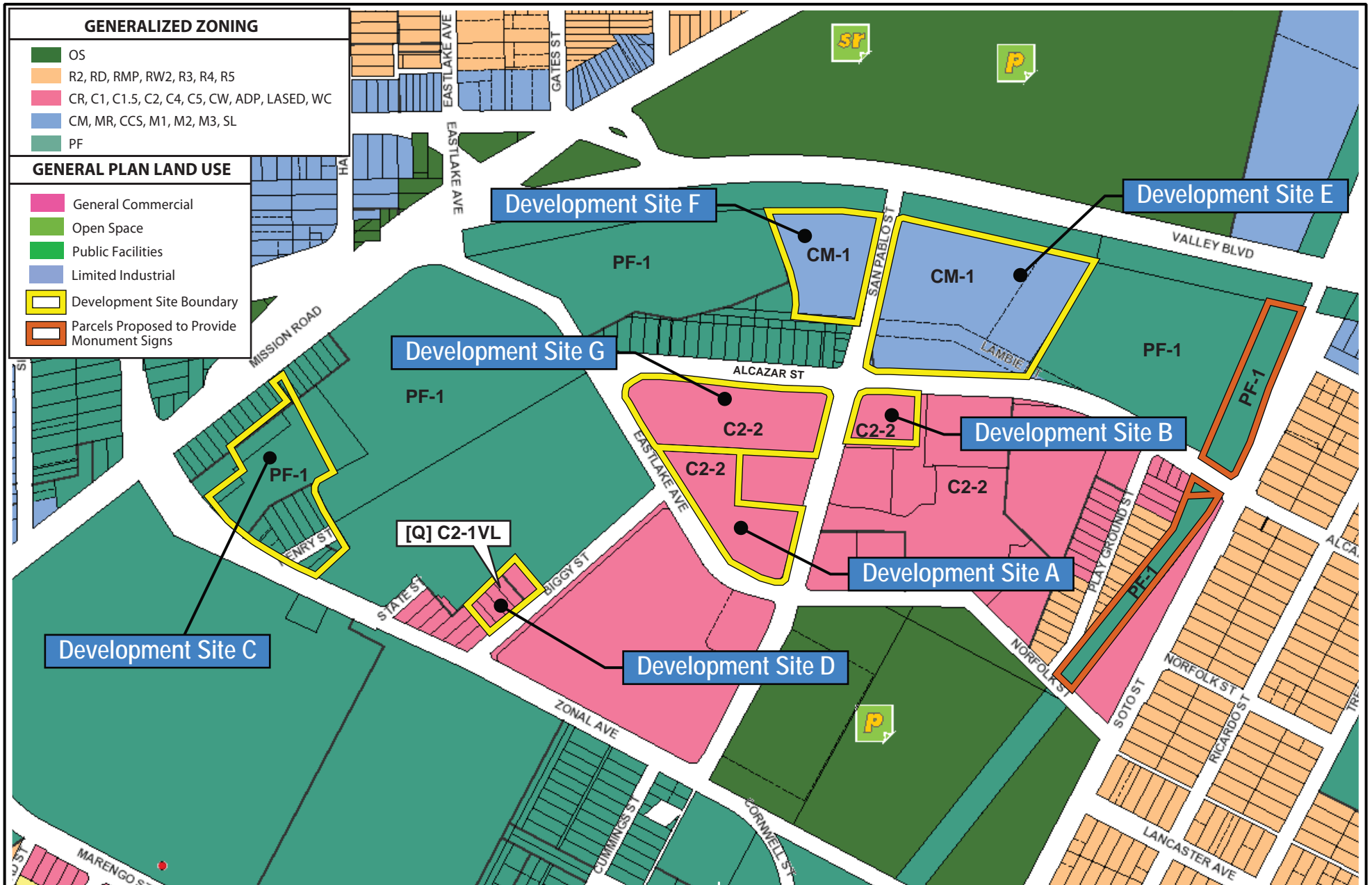
*(a) Northeast Los Angeles Community Plan*

As shown in Figure 5 on page 50, per the Community Plan, Development Sites A, B, D, and G are designated as General Commercial, while Development Site C is designated for Public Facilities. Development Sites E and F are designated Limited Industrial. The proposed academic, medical research, and medical office uses and potential parking facilities would be compatible with the uses designated for the Project Site as defined in the Community Plan. In addition, the Original Project would be consistent with the site planning, neighborhood compatibility, landscape, access, aesthetic, light and glare and transit oriented goals of the Community Plan. Specifically, the architectural style of proposed buildings would be similar to the existing HSC buildings and articulated surfaces on building walls would avoid large, sterile expanses on building walls. Proposed buildings would also feature signage and lighting consistent with existing HSC operations. Furthermore, the Original Project would include the creation of new exterior courtyards and walkways between and around proposed buildings, which would serve to create a pedestrian-friendly campus environment that would facilitate pedestrian access to the entire facility by limiting pedestrian and vehicle interfaces and providing parking at selected locations within the HSC. Additionally, the proposed change in the land use designations of Development Site C from Public Facilities to General Commercial and Development Sites E and F from Limited Industrial to General Commercial would be compatible with the designations of the surrounding HSC parcels and would be compatible with the intent and policies of the Community Plan. Moreover, the proposed vacation of Henry Street would have no bearing on land uses in and around the Project Site as this street has been paved over and out of circulation for over twenty years and is entirely internal to Development Site C. Based on the above, land use impacts of the Original Project in relation to the Northeast Los Angeles Community Plan would be less than significant.

*(b) Los Angeles Municipal Code*

Per the LAMC, Development Sites A, B, and G are zoned C2 (Commercial), while Development Site C is zoned PF (Public Facilities) and Development Site D is zoned [Q]C2-1VL (Commercial, Height District 1VL). Development Sites E and F are zoned CM





Source: City of Los Angeles ZIMAS, 2013.

(Commercial Manufacturing). Development Sites A, B, and G are located within Height District 2 for which the applicable height limitation is defined in terms of permitted floor area.<sup>12</sup> Specifically, the total floor area in all buildings within Height District 2 shall not exceed six times the buildable lot area. Development Sites C, E, and F are located in Height District 1. Since Development Site C is zoned PF, the total floor area permitted on this site is limited to three times the buildable area. In addition, as Development Sites E and F are zoned CM, the total floor area permitted on these sites is limited to 1.5 times the buildable lot area. Development Site D is located within Height District 1VL. No building or structure in Height District 1VL shall exceed three stories, nor shall it exceed 45 feet in height. The [Q] condition on Development Site D prohibits 100 percent residential development, and limits residential development, should it occur, to that permitted in the RD1.5 zone.

As detailed in Section 12.14 of the LAMC, the C2 and CM commercial zones permit a wide variety of commercial uses, including medical laboratory, and allow the provision of surface parking in support of commercial uses. In order to implement the Original Project, a zone change from CM-1 to C2-2 is proposed for Development Sites E and F. In addition, as the Original Project proposes a private parking facility on Development Site C, a zone change from PF to C2 is required. These proposed zone changes would be compatible with the zoning designations assigned to the surrounding HSC parcels and would be consistent with the intent and policies of the Community Plan.

In regards to floor area, Development Site A is approximately 2.46 acres or 91,912 square feet in size. Thus the total floor area permitted on this site would be a maximum of 551,472 gross square feet. As the Original Project proposed a maximum of 465,000 gross square feet of development on Development Site A, it would be consistent with the existing height district for this particular site. Development Site B is approximately 1.13 acres or 49,223 square feet and the total floor area permitted would, therefore, be a maximum of 295,338 gross square feet. The Original Project proposed a maximum of 295,338 gross square feet of floor area for this Development Site and would therefore be consistent with the existing height district for this particular site. Development Site G is approximately 4.0 acres or 174,240 square feet. Thus, the up to 100,000 square feet of floor area proposed would be well within the maximum permitted development of 1,045,440 square feet. As parking facilities do not count toward the permitted floor area, the Original Project is consistent with the existing height district for Development Site C. A maximum of 50,312 gross square feet of University and/or medical-related uses would be permitted within Development Site D. As the size of Development Site D is approximately 0.77 acre, or 33,541 gross square feet, and the site is within Height District 1VL, a height district change from 1VL to 2 would be required to comply with the LAMC. Development

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<sup>12</sup> Total floor area and height limitations are regulated by LAMC Section 12.21.1.

Site E is approximately 7.64 acres in size and would permit a maximum of 499,198 gross square feet, while Development Site F is approximately 2.65 acres permitting a maximum floor area of 115,434 gross square feet. Although the proposed development on Development Site E is consistent with the existing height district, the Original Project proposes a height district change to Height District 2 to provide for a consistent Height District 2 across the Project Site. In addition, as the maximum amount of development proposed for Development Site F would exceed the permitted floor area, a height district change from 1 to 2 would also be required for this Development Site. However, the heights of proposed buildings that may occur on Development Sites D, E, and F would be consistent with the heights of the surrounding HSC structures. Furthermore, the location of these Development Sites would be sufficiently distant from Lincoln and Hazard Parks and off-site residential uses so as to not alter the land use relationships that currently exist.

*(c) General Plan Framework*

The Metro Long Range Land Use Diagram of the General Plan Framework designates the Project Site as a Community Center. The Original Project proposes to develop academic and medical-related facilities on sites that are currently used as surface parking lots or are undeveloped within the existing HSC. These proposed uses are consistent with the uses permitted within the Community Center General Plan Land Use designation. In addition, development of these sites would preserve the character of the surrounding neighborhood, as the proposed development would assist in enhancing the established HSC with similar uses. On an overall basis, the Original Project would enhance the urban character of the Project Site area and with the proposed improvements, the Original Project's land use impacts in relation to the City's General Plan Framework would be less than significant.

*(d) Adelante Eastside Development Project*

The principal goal of the Adelante Eastside Development Project is to improve living conditions, upgrade public improvements, increase commercial choices, and revitalize the industrial base while preserving existing businesses and industry. As the Original Project would preserve and enhance the existing HSC, a unique commercial and institutional resource of the community, the Original Project is consistent with the policies or goals of the Adelante Eastside Redevelopment Plan.

*(e) Regional Plans*

As the Original Project would be developed in an established area of the City, in which existing facilities and infrastructure are already in place and would be available to the Original Project, and as the Original Project would be served by the nearby San Bernardino (I-10), and Golden State (I-5) Freeways as well as public transit via the Metro, DASH, and

USC shuttle systems, the impact of the Original Project on RCPG policies would be less than significant. In addition, development of the Original Project would result in less than significant impacts with regards to the Los Angeles County CMP. Furthermore, as the Original Project would not result in an increase in the frequency or severity of an existing air quality violation or create a new violation, the Original Project would be consistent with the AQMP.

*(f) Project Compatibility with Surrounding Land Uses*

Development of academic and medical-related facilities on the seven Development Sites would be consistent with the existing uses found within the HSC. In addition, as part of an established campus of related land uses, the proposed buildings would not physically divide an established community, but rather would assist in infilling the established HSC with similar uses. Similarly, the development of parking facilities on one or more of Development Sites B, C, D, E, and F would not result in the physical separation of any established community.

The HSC is bounded by public, commercial, institutional, residential, and recreational land uses. The closest residential uses are located approximately 700 feet east of Development Site B along the east and west sides of Playground Avenue, which bisects the eastern portion of the HSC. However, no land use compatibility impacts between the Development Sites and these residential uses are anticipated, as existing HSC structures separate the Development Sites from these residential uses. In addition, with regards to nearby recreational uses, Lincoln Park is located approximately 0.25 mile from the nearest Development Site and is further separated from the Project Site by Valley Boulevard and the railroad tracks that parallel the southern side of Valley Boulevard and existing HSC structures. Additionally, while Development Site A and Hazard Park are located at opposite corners of the intersection, any buildings on Development Site A would be separated from Hazard Park by San Pablo Street and Eastlake Avenue/Norfolk Street, and also by the ornamental landscape buffer that exists directly north of Eastlake Avenue. The remaining Development Sites are located further north from Hazard Park and are separated from the park by existing HSC buildings. Furthermore, the development of additional academic, medical-related, and academic support facilities within the existing HSC would be compatible with the surrounding institutional uses given their similarities in land use classification. In conclusion, 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. Therefore, the land use impacts of the proposed uses on the Project Site relative to compatibility with the nearby land uses would be less than significant.

## 2. Modified Project Impacts

As described above, a modification to the Original Project has been proposed to change the type of development previously planned for Development Site E. Specifically, as shown in Table 1 on page 13, the maximum amount of development analyzed in the Certified EIR for Development Site E of between 118,000 square feet of medical clinic facilities and up to 400,000 square feet of academic and/or medical research facilities, and parking facilities would be substituted for graduate student housing uses comprising approximately 238,500 square feet and providing 185 dwelling units, amenities, and a child care center. A hotel providing up to 275 rooms may also be constructed within Development Site E adjacent to the proposed graduate student housing uses. In addition, a modification to the maximum amount of square footage to be developed is proposed. Specifically, the Applicant proposes to provide flexibility in the amount and type of floor area to be developed so long as the peak-hour vehicle trips do not exceed that set forth in the Certified EIR. Furthermore, the Modified Project also proposes to modify the existing roadway classifications to allow for pedestrian enhancements and aesthetic improvements within the HSC. As described above, discretionary approvals proposed under the Modified Project include the following:

- General Plan Amendment from Limited Industrial to General Commercial or Neighborhood Commercial for Development Site E;
- General Plan Amendment to the Northeast Los Angeles Community Plan and the Transportation Element of the City of Los Angeles General Plan for reclassification of San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, and Playground Street;<sup>13</sup>
- General Plan Amendment to change the land use designation on two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from Public Facilities to General Commercial;
- Zone Change from CM-1 and [T][Q]CM-1 to [T][Q]C2-2 for Development Site E;
- Zone Change for two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from PF-1 to [Q]C2-1;
- Subdivision approval (parcel map or lot line adjustment) to create separate legal parcels for the hotel and student housing projects;

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<sup>13</sup> As indicated in the memo from the City of Los Angeles Bureau of Engineering dated September 24, 2012, and included as Appendix E of this Addendum, the Bureau of Engineering reviewed the proposed roadway reclassifications and provided clarifications regarding the requested General Plan Amendment. Specifically, the Bureau of Engineering determined that previous improvement conditions would need to be deleted as part of the requested General Plan Amendment, as they are obsolete or inconsistent with the changes proposed by the Modified Project.

- Conditional Use Permit for alcohol service in the hotel;
- Site Plan Review for the various projects pursuant to LAMC § 16.05.C;
- Haul Route Permit;
- Grading, excavation, and building permits; and
- Any other City of Los Angeles permits or approvals as may be required.

Figure 6 on page 56 illustrates the proposed changes in land use designations and zoning.

*(a) Consistency with Local and Regional Plans*

As indicated above, a General Plan Amendment to change the Community Plan designation of Development Site E from Limited Industrial to General Commercial or Neighborhood Commercial is proposed to provide for the hotel/student housing uses proposed under the Modified Project. In addition, the Modified Project also proposes a General Plan Amendment to the Community Plan and the Transportation Element of the General Plan for reclassification of San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, and Playground Street to allow for enhancements to the existing pedestrian and aesthetic environment of the HSC. Furthermore, as shown in Figure 6, the Modified Project includes an additional General Plan Amendment to change the land use designation on two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from Public Facilities to General Commercial to accurately reflect private ownership and also allow the placement of monument signage.

With the inclusion of new student housing and hotel uses as well as additional medical clinic, and academic and/or medical research facilities, the Modified Project would serve to enhance the existing HSC by expanding the range of uses currently provided. In addition, with implementation of the proposed pedestrian enhancements and aesthetic improvements, the Modified Project would promote walkability, increase outdoor space, improve connections within the HSC, improve vehicular circulation around the campus, and enhance linkages between the adjacent Lincoln Park and Hazard Park. The design of new buildings would also continue to incorporate streetscape improvements, exterior courtyards, landscaped walkways between buildings, and new landscaping. Furthermore, new buildings would be similar in height to existing buildings within the Project vicinity and would be designed with high quality architecture. Therefore, like the Original Project, the Modified Project would further Community Plan Policy 6-1.1, which seeks to “encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character.” In addition, the new hotel uses to be provided under the Modified Project would further Community Plan Objective 2-1, to “conserve and strengthen





potentially viable commercial areas in order to stimulate and revitalize existing businesses and create opportunities for appropriate new commercial development.” Additionally, with the narrowing of intersections and installation of curb extensions, where feasible, the Modified Project would reduce the potential for pedestrian/vehicular conflicts and enhance pedestrian safety and would serve to further Community Plan Objective 2-3, to “minimize conflicts between auto-related and pedestrian-oriented activities and encourage use of public transportation in commercial areas.” The Modified Project would also continue to support the several other Community Plan objectives and policies set forth in the Certified EIR.

The Modified Project would also further specific goals, objectives, and policies related to Community Centers included in the City of Los Angeles General Plan Framework. In particular, with implementation of the proposed pedestrian enhancements and aesthetic improvements, the Modified Project would further Goal 3, “to provide a pedestrian-oriented, high activity, multi- and mixed use center that supports and provides identity for Los Angeles’ communities.” In addition, with the provision of new student housing, hotel, and additional medical clinic, and academic and/or medical research facilities, the Modified Project would support Objective 3.9, to “reinforce existing community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work, and visit, both in daytime and nighttime.” Similarly, the Modified Project would be consistent with Policy 3.9.2 to “encourage the integration of school classrooms, libraries, and similar educational and cultural facilities within commercial, office, and mixed commercial-residential structures.” Furthermore, the Modified Project would also further Policy 3.9.7 to “provide for the development of public streetscape improvements.”

The Modified Project’s proposed student housing, hotel, and additional medical clinic, and academic and/or medical research facilities would be consistent with the Redevelopment Plan objective to “improve the quality of life for those who live and work in and visit the Redevelopment Plan Area through enhanced business, employment, housing, shopping, entertainment, recreational, and educational opportunities.” In addition, the Modified Project would further the Redevelopment Plan’s goal/objective to “support and encourage a circulation system that will improve the quality of life in the Redevelopment Plan Area, including pedestrian, automobile, parking, and mass transit system, with emphasis on serving existing facilities and meeting future needs.” Additionally, the Modified Project would also further the Redevelopment Plan’s goals/objectives to “preserve and increase employment, training, business, and investment opportunities through redevelopment programs.” On an overall basis, the modifications to the Original Project would not interfere with the types of development already present within and around the HSC and would also not inhibit implementation of applicable regional plans.



Based on the above, with approval of the proposed land use designation change, no significant impacts associated with consistency with the land use plans would occur and such impacts would be within the envelope of impacts set forth in the Certified EIR.

*(b) Consistency with Zoning*

As described above, the applicable height limitation for each of the Development Sites is defined in terms of permitted floor area. The proposed HCC IV building within Development Site B is anticipated to have a maximum height of 95 feet and a maximum floor area of 106,700 square feet. As Development Site B is zoned C2 and is within Height District 2, the total floor area shall not exceed six times the buildable lot area. Development Site B is approximately 1.13 acres or 49,223 square feet and the total floor area permitted would, therefore, be a maximum of 295,338 gross square feet. When accounting for development underway for Development Site B (HCC III), and the maximum development proposed for HCC IV, the total floor area within Development Site B would be approximately 271,800 square feet. Based on the proposed height and maximum development proposed, development within Development Site B under the Modified Project would be within the height and floor area limits set forth by existing zoning and consistent with the building heights analyzed in the Certified EIR. In addition, the proposed uses would be consistent with existing zoning and consistent with the uses evaluated in the Certified EIR.

With regard to Development Site E, the Modified Project proposes to provide student housing uses comprising approximately 238,500 square feet and possibly hotel uses comprising up to 250,000 square feet. The height of the new student housing buildings would be approximately 67 feet, while the height of the hotel building would be a maximum 175 feet. Based on existing zoning, the maximum permitted floor area for Development Site E shall not exceed 499,198 square feet. In addition, with approval of the zone change from CM-1 and [T][Q]CM-1 to C2-2, which would permit a floor area up to six times the buildable lot area, the maximum floor area permitted within Development Site E would increase to 1,996,790. Thus, the maximum floor area of 488,500 proposed for Development Site E under the Modified Project would be well within the permitted floor area set forth by existing and proposed zoning. In addition, the proposed student housing and hotel uses would be consistent with the uses permitted under the proposed C2-2 zone. Furthermore, as described above under Subsection A, Visual Resources, the height increase associated with the hotel would be compatible with the maximum heights allowed in other Development Sites, including Development Sites A and B (150 feet) and existing multi-story buildings within and surrounding the HSC such as the nearby Los Angeles County/USC Medical Center building (247 feet).<sup>14</sup> Therefore, the increase in height and

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<sup>14</sup> *Emporis, Building Directory, [www.emporis.com/building/losangelescountyuscmcdicalcenter-losangeles-ca-usa](http://www.emporis.com/building/losangelescountyuscmcdicalcenter-losangeles-ca-usa), accessed March 28, 2012.*

proposed student housing and hotel uses for Development Site E would not pose any inconsistencies with applicable land use regulations should the requested discretionary actions be approved by the City. Thus, significant impacts associated with consistency with zoning would not occur and such impacts would be within the envelope of impacts set forth in the Certified EIR.

Additionally, as previously noted, the proposed zone change for two parcels located southwest and one parcel located northwest of Alcazar Street and Soto Street from PF-1 to [Q]C2-1 is proposed to accurately reflect private ownership and allow for the installation of monument signage within these parcels. The development of new buildings or other structures within these parcels is not proposed as part of the Modified Project. In addition, the proposed Q condition would prohibit further development within these parcels without a plan approval. As such, the installation of monument signage within these parcels would not introduce any inconsistencies with applicable land use regulations as the proposed zone change would be consistent with existing adjacent zoning and land uses. Therefore, no significant impacts with consistency with zoning would occur and such impacts would be within the envelope of impacts set forth in the Certified EIR.

*(c) Land Use Compatibility*

With regard to land use compatibility, though the Modified Project proposes a change in the land uses previously planned for Development Site E, the proposed hotel and student housing uses would be consistent and compatible with the land use mix of the surrounding area. In addition, the design of the proposed structures would be compatible with the existing HSC buildings and the nearby institutional and residential uses surrounding the HSC. Furthermore, based on the location of the Development Sites within the HSC campus, the Modified Project would not disrupt or divide a community. Additionally, with implementation of the proposed streetscape improvements, no public roadways or sidewalks would be permanently closed or relocated and no separation of uses or disruption of access between land uses would occur. The Modified Project would result in the continued use of the internal roadways for vehicular and pedestrian access and the overall HSC for educational, research, and medical purposes and would be consistent in terms of use and general character with the surrounding uses. Thus, the Modified Project would result in less than significant impacts with regard to land use compatibility. Such impacts would be similar to those of the Original Project, and within the envelope of impact analysis addressed in the Certified EIR.

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## J. Mineral Resources

### 1. Original Project Impacts

The Project Site is not located in an area containing significant mineral deposits, as designated by the City of Los Angeles. In addition, the applicable local land use plans do not delineate that the Project Site or the surrounding area contain significant mineral deposits or are designated as a locally important mineral resource site. Therefore, development associated with the Original Project would not change the availability of known or potential mineral resources or result in the loss of availability of a locally important mineral resource recovery site delineated on a land use plan. As such, no impacts to mineral resources would occur and no mitigation measures are necessary.

### 2. Modified Project Impacts

As described above, the Project Site does not contain mineral deposits and such uses are not proposed as part of the Modified Project. Therefore, similar to the Original Project, no impacts to mineral resources would result from the Modified Project. Such impacts would be within the envelope of impact addressed in the Certified EIR.

## K. Noise

As described further in the Certified EIR, sound pressure is measured and quantified using a logarithmic ratio, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted system is used to adjust measured sound levels. The A-weighted sound level is expressed as “dBA.” In addition, time variation in noise exposure is typically expressed in terms of the average energy over time ( $L_{eq}$ ), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time. In accordance with the City of Los Angeles Noise Regulation limits for residential zones, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. Furthermore, the City of Los Angeles has also adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City of Los Angeles CEQA Thresholds Guide (Thresholds Guide) in terms of the Community Noise Equivalent Level (CNEL). A CNEL value of 70 dBA is the upper limit of what is considered a “normally acceptable” noise environment for business and professional commercial uses, although a CNEL as high as 77 dBA is considered “conditionally acceptable.”

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## 1. Original Project Impacts

### *(a) Construction*

Maximum daytime noise level increases with Original Project construction would meet or exceed the 5 dBA noise level increase established by the City of Los Angeles Noise Regulation, and as such, impacts would be significant. With implementation of Mitigation Measure E-1 provided below, noise levels associated with construction activities would be reduced to some extent but would not be reduced below the significance threshold. As such, noise impacts associated with on-site construction noise are considered significant and unavoidable.

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, 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 associated with construction traffic would be less than significant, and no mitigation measures are necessary.

### *(b) Operation*

Operational noise impacts associated with the Original Project could occur from traffic noise; mechanical equipment such as boilers, chillers, pumps, and emergency generators; loading docks and refuse collection/recycling areas; proposed parking structures and surface parking lots associated with the activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals; and emergency helipads.

Regarding traffic noise, the incremental Project-related traffic noise level increases would be less than the specified thresholds, as described above, and would be less than significant. In addition, with compliance with City of Los Angeles Noise Ordinance requirements, impacts associated with mechanical equipment would also be less than significant. Noise associated with loading docks and refuse collection/recycling areas, however, could potentially affect the areas located immediately north and west of Development Site D (Juvenile Hall uses). With implementation of Mitigation Measure E-2, provided below, these impacts would be reduced to less than significant. With regard to potential noise impacts associated with proposed parking structures and surface parking lots, noise level increases were determined to be less than the City of Los Angeles Noise Regulation significance threshold at areas adjacent to potential Development Site locations. Lastly, due to the infrequent and emergency-only nature of helipad uses, adverse noise impacts related to such use would be less than significant.

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## 2. Modified Project Impacts

### *(a) Construction*

As previously described, the Modified Project involves modifications to the land use mix of the Original Project. The Modified Project also proposes to improve the existing pedestrian and aesthetic environment along San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, Playground Street, and Zonal Avenue between San Pablo Street and Biggy Street. The street improvements and modification to permit student and hotel uses as well as additional medical clinic and non-medical uses would not substantially change the types of construction activities compared to the Original Project. Therefore, peak daily construction activities and resulting noise levels of the Modified Project would be similar to the Original Project. In addition, the development proposed under the Modified Project would continue to be implemented within several of the Development Sites analyzed in the Certified EIR. Thus, as the distance to sensitive receptors and the intensity of construction activities would not change, construction noise levels for the Modified Project would be similar to the Original Project. In addition, the Modified Project would implement the same construction mitigation measure, as applicable, identified for the Original Project. Therefore, the Modified Project would not create any new significant impacts related to construction noise nor result in a substantial increase in a previously identified significant impact. As such, construction noise impacts under the Modified Project would be within the envelope of impact analysis addressed in the Certified EIR.

### *(b) Operation*

As the type and intensity of uses proposed under the Modified Project were specifically developed within the remaining trip generation of the Certified EIR, the volume and distribution of traffic under the Modified Project would be comparable to the Original Project. Thus, similar to the Original Project, operational traffic noise associated with the Modified Project would be less than the specified thresholds. In addition, though the Modified Project involves modifications to the land use mix of the Original Project, the new residential and hotel land uses would not typically involve operations that generate noise levels that would exceed the existing noise levels within and surrounding the HSC or those anticipated under the Original Project. Additionally, noise levels associated with the proposed childcare center outdoor play area would be consistent with existing land uses, including the nearby Lincoln Park and HSC's existing children's daycare center, and are not anticipated to affect nearby sensitive receptors. Furthermore, the Modified Project would implement the same operational mitigation measure, as applicable, that was identified for the Original Project. Thus, the modification to the land use mix would not be anticipated to generate significant noise levels at nearby sensitive receptors and would be considered less than significant. In addition, as required by the City's Code, appropriate noise insulation in the design of the residential and hotel buildings would be provided to

reduce the exterior noise level to 45 dBA CNEL within the interior of the buildings. Therefore, the Modified Project would not result in a new significant and unavoidable impact or substantially worsen a previously identified significant impact with respect to operational noise. As such, operational noise impacts under the Modified Project would be within the envelope of impacts identified in the Certified EIR.

The Modified Project proposed improvements along San Pablo Street, Alcazar Street, Eastlake Avenue, Norfolk Street, Biggy Street, Zonal Avenue between San Pablo Street and Biggy Street, and Playground Street and are not forecasted to generate any new daily trips, based on the Project's traffic analysis. However, the traffic on internal roadways is expected to change distribution patterns as a result of the proposed roadway modifications. In particular, the narrowing of San Pablo Street between Alcazar Street and Eastlake Avenue/Norfolk Street is expected to shift a portion of the current traffic (approximately 40 percent) from this roadway segment to the streets on the loop formed by Alcazar Street, Eastlake Avenue, Norfolk Street, and Playground Street.

This change in roadway traffic volumes was analyzed to determine if traffic-related noise impacts would result from Project development. The Project-generated traffic noise impact is determined by comparing the increase in noise levels from the "future without project" to "future with project" conditions against the Project's significance threshold. The incremental significance threshold for both Project-level and cumulative level traffic noise is 3 dBA CNEL. An increase in traffic noise levels of 3 dBA is equivalent to doubling the traffic volume. Traffic volume along Eastlake Avenue from Alcazar Street to San Pablo Street will increase 40 percent, less than the 50 percent required to reach a 3-dBA increase in noise; therefore, off-site traffic noise impacts associated with the Project would be less than significant, and no mitigation measures would be required.<sup>15</sup>

As previously described, Norfolk Street would be extended from its current terminus at Playground Street to a new intersection with Soto Street. An additional evaluation of traffic noise along this new roadway segment was conducted to determine whether the land uses along this segment would be considered consistent with the City guidelines for Noise/Land Use Compatibility. The new roadway segment would result in 59.9 dBA CNEL at a distance of 50 feet from the right-of-way. Adjacent land uses along this segment include a neighborhood park and a hospital. According to the City guidelines for Noise/Land Use Compatibility, noise from the new roadway segment at these noise receptors would be well within the "normally acceptable" noise level. As a result, land use compatibility impacts with regard to community noise levels would be less than significant, and no mitigation measures would be required.

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<sup>15</sup> Gibson Transportation Consulting, Inc., Memorandum, Campus Beautification Project, USC Health Sciences Campus, April 30, 2012.

### 3. Mitigation Measures

The mitigation measures set forth in the MMRP included in the Certified EIR and provided below remain applicable to the Modified Project. No additional mitigation measures are required due to the development of the Modified Project.

#### *(a) Construction*

**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).

#### *(b) Operation*

**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

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measure does not apply to development that may occur on Development Sites A, B, C, E, F, and G.

## L. Population and Housing

### 1. Original Project Impacts

Development associated with the Original Project would occur within an urbanized area with existing infrastructure and roadways, and would not result in the extension of roads or major infrastructure. In addition, development associated with the Original Project would occur on sites that do not contain residential uses and none were proposed as part of the Original Project. The Original Project would also not displace existing housing, nor would it displace numbers of people, necessitating the construction of replacement housing elsewhere. While new employment opportunities would be created by the Original Project, most of the expected employees would be drawn from the existing labor force in the region and would not require the need to relocate or place a demand for housing in the area. It is possible that some of the future employees would be new residents of the area; however, it is unlikely that this growth would be substantial in the context of the growth forecasted for the City of Los Angeles. As such, impacts on population and housing associated with the Original Project would be less than significant, and no mitigation measures are necessary.

### 2. Modified Project Impacts

The Modified Project proposes 185 new graduate student housing units, which would provide a total of 447 beds. For the purposes of this analysis, the number of beds is used as a surrogate for population. As such, the Modified Project would result in a direct population increase of 447 persons. Therefore, the Modified Project would result in an increase in the residential population within and surrounding the HSC compared to the Original Project. However, this direct population growth would be consistent with the SCAG growth forecast for the City of Los Angeles Subregion. Specifically, the Modified Project population would represent approximately 0.011 percent of the 2014 population (4,199,369) forecasted for the City of Los Angeles Subregion.<sup>16,17</sup> In addition, it is anticipated that the new graduate student housing units would primarily be occupied by the existing student population. As such, the Modified Project is not expected to induce substantial population growth, nor exceed the population forecast for the City of Los Angeles. Additionally, to the extent that the Modified Project helps accommodate the

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<sup>16</sup> SCAG regional growth forecast adopted for the 2008 Regional Transportation Plan Update ([www.scag.ca.gov/forecast/index.htm](http://www.scag.ca.gov/forecast/index.htm)).

<sup>17</sup> Based on a straight-line interpolation between 2005 and 2010 values in the SCAG regional growth forecast adopted with the 2008 Regional Transportation Plan Update. The year 2014 represents the anticipated build-out year of the graduate student housing uses.



anticipated population growth, its population impacts are considered beneficial. Moreover, with the Modified Project's added supply of student housing, development of the Modified Project would have a beneficial impact on the housing market. Thus, impacts on the local population and housing market would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

## **M. Public Services**

### **1. Original Project Impacts**

#### *(a) Fire*

The Los Angeles Fire Department (LAFD) provides fire protection to the Project Site. The nearest LAFD stations are Station 1 at 2230 Pasadena Avenue and Station 2 at 1962 East Cesar Chavez Avenue, both approximately 1 mile from the Project Site. Both stations feature two engine units and one rescue unit. As the distance from either Station 1 or Station 2 to the Project Site is approximately 1 mile, the Project Site is within the LAMC response distance standard. Notwithstanding, educational, medical research and office buildings as well as the parking structure associated with the Original Project would be constructed to include fire safety features such as sprinklers in accordance with LAMC requirements to ensure adequate fire protection. Furthermore, plan check procedures conducted by the City of Los Angeles during the building permit process would identify additional fire safety features in accordance with applicable standards and would identify any needs for additional measures to assure the adequate provision of fire protection services to the Project Site. As such, the Original Project would result in a less than significant impact related to the provision of fire protection, and no mitigation measures are necessary.

#### *(b) Police*

The City of Los Angeles Police Department (LAPD) provides police protection to the Project Site and surrounding area. The Project Site is specifically within the Hollenbeck Community Policing area, which encompasses the communities of El Sereno, Lincoln Heights and Boyle Heights. The Hollenbeck Community Police Station is located at 2111 East 1st Street, approximately 1.5 miles south of the Project Site. The Original Project buildings would be designed with security features, such as controlled access and illumination of public and semipublic spaces to minimize opportunities for criminal activity, thereby reducing the demands placed upon police services. 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 Original Project. Based on the above, any Original Project impacts on police protection services are expected to be less than significant, and no mitigation measures are necessary.

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*(c) Schools*

The proposed educational and medical research and office buildings on Development Sites A, B and possibly D and the parking structure on Development Site C and also possibly on Development Site D 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 may 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. In addition, the Original Project would be subject to the development fees of the Los Angeles Unified School District. Specifically, Senate Bill 50 (SB 50), enacted in 1998, states that the payment of a fee, charge or other levy pursuant to the provisions of Section 17620 of the Education Code is deemed to provide full and complete mitigation for any impact to school facilities. As such, Original Project development would result in a less than significant impact on schools, and no mitigation measures are necessary.

*(d) Parks*

There are several park and public recreational facilities within the surrounding area, most notably Hazard Park and Lincoln Park, located southeast and north of the Project Site, respectively. Lincoln Park is located north of Valley Boulevard. The proposed educational, medical research and medical office buildings on Development Sites A, B and possibly D, and the parking structure on Development Site C and also possibly on Development Site D are non-residential in nature. Employees of these buildings are not expected to make significant use of the nearby parks as the majority of the recreational needs of Project-related employees would be met by park facilities near their place of residence or by regional park facilities. In addition, the residences of potential new employees are expected to be distributed among several municipalities and are not expected to result in a significant increase in demand for parks in any specific city, community or neighborhood. Therefore, the Original Project's impacts on parks would be less than significant, and no mitigation measures are necessary.

*(e) Libraries and Other Public Services*

Other public facilities that would serve the Original Project include libraries, roads and transit, utility systems such as water and sewer infrastructure, as well as other general public facilities. The Original Project is part of an educational and medical campus. The Project is non-residential in nature and most of the expected employees would be drawn from the existing labor force in the region. As such, the Original Project would not directly generate any other new demand for public facilities. Therefore, impacts to other governmental services would be less than significant, and no mitigation measures are necessary.

## 2. Modified Project Impacts

### *(a) Fire*

The Modified Project's development of graduate student housing units would increase the residential service population of Fire Stations 1 and 2 and would potentially increase the demand for fire protection services as provided by these stations. However, it is anticipated that the new graduate student housing units would be occupied by the existing student population already present within the campus. Therefore, the activity levels under the Modified Project, compared to the Original Project, would represent a minor increase in the overall population served by the fire stations in proximity of the Project Site. Additionally, though the fire fighting resources of Station 1 have been reduced to one engine unit and one rescue unit,<sup>18</sup> compared to what was provided in the Original project, the fire fighting resources of Station 2 have increased to three engine units and one rescue unit.<sup>19</sup> In addition, as with the Original Project, the Modified Project would include any fire safety features in accordance with LAMC requirements and as required by the City during the normal building permit process to provide for the adequate provision of fire protection services to the Project Site. Therefore, sufficient fire fighting and paramedic resources are anticipated to be available to meet the minor increased demand attributable to the Modified Project. Furthermore, as the type and intensity of uses proposed under the Modified Project were specifically developed within the remaining trip generation of the Certified EIR, the volume and distribution of traffic under the Modified Project would be comparable to the Original Project. Thus, the Modified Project would not interfere with emergency vehicle access to the Project Site. Additionally, as set forth in the memorandum from the Los Angeles Fire Department included as Appendix F, the Los Angeles Fire Department has determined that no significant impacts with respect to emergency access or fire protection services would occur as a result of the Modified Project.

Based on the above, the Modified Project would not create any new impacts with respect to fire protection services nor increase the severity of any previously identified impacts. Therefore, impacts on fire protection services would be less than significant and within the envelope of impacts identified in the Certified EIR.

### *(b) Police*

The LAPD utilizes an area's resident population to determine service needs, in the form of an officer-to-resident ratio. As the Modified Project would involve a change in the land use mix of the Original Project and develop new graduate student housing units, the

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<sup>18</sup> Personal communication with Captain Ponce of Station 1. April 10, 2012.

<sup>19</sup> Personal communication with Captain George Perez of Station 2. April 11, 2012.

Modified Project would increase the residential population and potentially increase the demand for police protection services over the Original Project. However, it is anticipated that the new graduate student housing units would be occupied by the existing student population that would already be present within the campus. Furthermore, the Modified Project would implement the same security features identified for the Original Project and the USC Department of Public Safety would continue to address safety and security concerns within the HSC. Therefore, any impacts on police protection services associated with the Modified Project are expected to be less than significant. Such impacts would be within the envelope of impacts identified in the Certified EIR.

*(c) Schools*

The Modified Project would result in a direct increase in the residential population and an associated increase in the demand for schools within the Los Angeles Unified District service area. However, development of the Modified Project would be subject to the school fees required by Government Code Section 65995. The payment of these development fees constitutes full mitigation of school impacts, and thus impacts under the Original Project would be less than significant. Such impacts on schools would be within the envelope of impacts identified in the Certified EIR.

*(d) Parks*

The demand for parks and recreational services is primarily the function of the amount of residential development in an area, as an area's residents are considered the primary users of parks and recreation facilities. Therefore, the Modified Project's new student housing population of approximately 447 persons is anticipated to result in some increased use of the nearby Lincoln and Hazard Parks and other existing neighborhood, community, and regional parks. The Modified Project would provide open-space areas and recreational amenities as part of development of the new student housing units. In addition, the student housing component would satisfy the City's open space requirements as set forth in the LAMC. Accordingly, the Modified Project is not anticipated to result in significant impacts to parks and such impacts would be within the envelope of impacts set forth in the Certified EIR.

*(e) Libraries and Other Public Services*

Library services within the Project area are provided by the City of Los Angeles Public Library (LAPL) and also within the HSC. The closest public libraries to the Project Site are the Malabar Library located at 2801 Wabash Avenue, Benjamin Franklin Library located at 2200 East 1st Street, and the Lincoln Heights Library located at 2530 Workman

Street, all approximately 1 mile from the Project Site.<sup>20</sup> As the Modified Project would result in an increase in the residential population, the Modified Project would generate a direct increase in the demand for library services. However, as the proposed new graduate student housing units would be occupied primarily by the existing student population already present within the campus, the actual demand on library resources for professional daytime use by Modified Project residents would be minimal, particularly since student research needs are commonly met by in-house or on-line reference resources. Therefore, the Modified Project would result in less than significant impacts on library facilities and such impacts would be within the envelope of impacts identified in the Certified EIR.

## **N. Recreation**

### **1. Original Project Impacts**

There are several park and public recreational facilities within the surrounding area, most notably Hazard Park and Lincoln Park. The Original Project does not propose residential uses, which could create a direct demand for parks and recreational facilities. While new employment opportunities would be provided by the Original Project, these employees are not expected to make significant use of the nearby parks. In addition, the majority of the recreational needs of employees would be met by park facilities near their place of residence or by regional park facilities. As the residences of potential new employees are expected to be distributed among several municipalities, use of parks and other recreational facilities by potential new employees is not expected to result in a significant increase in demand for parks in any specific city, community or neighborhood. Therefore, potential impacts to parks or other recreational facilities resulting from the Project would be less than significant, and no mitigation measures are necessary.

### **2. Modified Project Impacts**

The demand for parks and recreational services generated by a project is primarily a function of the amount of residential development that is being proposed. Therefore, the Modified Project's new residential population associated with the proposed 185-unit graduate student housing component would result in an increase in the residential population, which could result in a corresponding increase in the use of the nearby Lincoln and Hazard Parks and other existing neighborhood, community, and regional parks and recreational facilities. However, it is anticipated that the new graduate student housing units would be occupied by the existing student population present within the campus, which may already use nearby recreational facilities. Furthermore, the Modified Project would satisfy the City's open space requirements as set forth in the LAMC. Thus, the

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<sup>20</sup> *Los Angeles Public Library, Find a Library Near You, Selection for "90033," [www.lapl.org/maps/branch\\_googlemap.php?zipcode=90033](http://www.lapl.org/maps/branch_googlemap.php?zipcode=90033), accessed March 27, 2012.*

Modified Project would not substantially increase the use of off-site neighborhood and regional parks and recreational facilities, nor would it substantially increase demand for recreation programs. Modified Project impacts on recreation facilities would be less than significant. Such impacts would be within the envelope of impacts set forth in the Certified EIR.

## **O. Traffic, Circulation, and Parking**

### **1. Original Project Impacts**

#### *(a) Construction*

Depending upon the specific nature of the construction activity (e.g., demolition, excavation, or concrete pouring), it was assumed that the majority of truck traffic would be distributed evenly across the workday and thus would not significantly interfere with HSC traffic patterns. In addition, any temporary lane closures during construction would normally be limited to between 9:00 A.M. and 3:00 P.M. In the event temporary lane closures are required, flag men would be used to control traffic movement during ingress or egress of trucks and heavy equipment from the construction site. As such, though Original Project construction may create a temporary inconvenience to auto travelers, bus riders, and pedestrians, with the required haul route approval and implementation of general construction management practices and specific project design features, Original Project traffic impacts during construction would be less than significant.

#### *(b) Operation*

In order to identify streets and intersections most likely to be impacted by Original Project traffic, the following 18 study intersections in the Project vicinity were identified in consultation with the LADOT. In addition, pursuant to LADOT's traffic study guidelines, Level of Service calculations were prepared for six scenarios. A summary of the potential Original Project traffic impacts for each scenario is provided further below.

1. I-5 Freeway Southbound (SB) Off-Ramp and Avenue 21-Main Street
2. I-5 Freeway SB Ramps and Mission Road
3. I-5 Freeway Northbound (NB) Off-Ramp and Daly Street-Main Street
4. Daly Street and Main Street
5. Mission Road and Daly Street-Marengo Street
6. I-5 Freeway NB On-Ramp and Marengo Street

7. Mission Road and Griffin Avenue-Zonal Avenue
8. Mission Road and Valley Boulevard
9. Mission Road and Main Street
10. Biggy Street and Zonal Avenue
11. San Pablo Street and Valley Boulevard
12. San Pablo Street and Alcazar Street
13. San Pablo Street and Eastlake Avenue-Norfolk Street
14. San Pablo Street and Zonal Avenue
15. Soto Street and Alcazar Street
16. Soto Street and I-10 Freeway Westbound (WB) Ramps-Charlotte Street
17. Soto Street and Marengo Street
18. Soto Street and I-10 Freeway Eastbound (EB) Off-Ramp-Wabash Avenue

*(1) Traffic*

Under a program consisting of 120,000 square feet of medical clinic facilities and 465,000 square feet of academic and medical research space, the Original 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 Original Project is expected to generate 774 vehicle trips (161 inbound trips and 613 outbound trips). Over a 24-hour period, the Original Project is forecast to generate 7,715 daily trips during a typical weekday.

Existing Conditions

Under the Certified EIR existing conditions, 16 of the 18 study intersections were operating at LOS D or better during both the A.M. and P.M. peak commuter hours. The remaining two intersections (Intersections 2 and 16) were noted to be operating at LOS E during the A.M. peak hour only.

Future Plus Project Conditions

With the addition of ambient growth traffic, 15 of the 18 study intersections are expected to continue operating at LOS D or better during both the A.M. and P.M. peak commuter hours, except for: Intersection 2 (LOS F during the A.M. peak hour);

Intersection 5 (LOS E during the P.M. peak hour); and Intersection 16 (LOS F during the A.M. peak hour and LOS E during the P.M. peak hour).

#### Future with Related Projects

With the addition of ambient growth traffic and the traffic due to the related projects, 14 of the 18 study intersections are forecasted to operate at LOS D or better during both the A.M. and P.M. peak commuter hours, except for: Intersection 2 (LOS F during the A.M. peak hour); Intersection 5 (LOS E during the A.M. and P.M. peak hour); Intersection 16 (LOS F during the A.M. and P.M. peak hour); and Intersection 17 (LOS E during the P.M. peak hour).

#### Future with Parking Scenario Nos. 1 and 2

In order to provide a conservative analysis of the Original Project's potential traffic impacts, two parking scenarios were developed that reflect the greatest concentration of Original Project-related traffic on the local roadway system. Parking Scenario No. 1 assumes that parking for the Original Project would be provided entirely within Development Site C. Parking Scenario No. 2 assumes that parking for the Original Project would be provided entirely within Development Site E or in combination of Development Sites E and F. Under these assumptions, 11 of the 18 study intersections would be significantly impacted by the development of the Original Project under both parking scenarios. Nine of the 11 impacted intersections would be the same intersections under both parking scenarios. These nine intersections, which would be impacted under both parking scenarios include Intersections 2, 3, 5, 6, 12, 14, 16, 17, and 18. In addition, Intersections 7 and 10 would be impacted under Parking Scenario No. 1 and Intersections 8 and 15 would be impacted under Parking Scenario No. 2.

#### Other Potential Traffic Impacts

Project impacts with regard to facilities under the jurisdiction of the Los Angeles County Congestion Management Plan would be less than significant. In addition, with regard to the Union Pacific crossing on San Pablo Street, south of Valley Boulevard, it is conservatively concluded that a 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 would be temporary in nature and would be alleviated once San Pablo Street is available as a through traffic route.

#### Traffic Impacts with Implementation of Mitigation Measures

After implementation of the Parking Scenario No. 1 mitigation measures provided below, impacts at seven of the 11 significantly impacted intersections would be reduced to a less than significant level. In addition, no feasible mitigation measures are available to



reduce the traffic impacts to a less than significant level at three of the remaining four intersections. The three intersections include Intersections 5, 7, and 16. Impacts at the fourth location, Intersection 17, may be reduced to a less than significant level with implementation of the applicable mitigation measure. However, as formal approval of the proposed improvements was not provided, the Certified EIR conservatively concluded that Original Project development would result in a significant traffic impact at Intersection 17.

With implementation of Parking Scenario No. 2 mitigation measures, impacts at eight of the 11 significantly impacted intersections would be reduced to a less than significant level. No feasible mitigation measures are available to reduce the traffic impacts to a less than significant level at two of the remaining three intersections. These two intersections include Intersections 8 and 5. Impacts at the third location, Intersection 17, would be the same as identified above under Parking Scenario No. 1.

As discussed above, trains currently slow or stop at the existing at-grade Union Pacific Railroad crossing immediately south of Valley Boulevard, causing vehicle queuing and occasionally rerouting of local traffic. An existing Public Utilities Commission ordinance limits the duration that trains can block at-grade crossings. However, enforcement of this ordinance is outside the authority of decision-makers associated with the Original Project. Thus, absent either enforcement of the PUC ordinance or a relocation of the train stoppage point, the Original Project would potentially contribute to an existing significant impact.

### *(2) Access*

With regard to 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 Original Project and Original Project mitigation conditions). Thus, Original Project development would result in a less than significant access impact.

### *(3) Parking*

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. As described above, 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 Original 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. Therefore, as the available parking supply would exceed the HSC's future parking demand, parking impacts would be less than significant.

## 2. Modified Project Impacts

### *(a) Construction*

Traffic and access impacts during construction of the Modified Project are anticipated to be similar to those described above for the Original Project. Specifically, as with the Original Project, it is anticipated that any trucks/construction equipment needed for construction of the Modified Project would be brought on the Project Site and be stored within the perimeter fence of the designated construction site. Thus, no staging of equipment is expected to occur on the perimeter public streets. In addition, as with the Original Project, the number of trucks hauling any export materials would be distributed throughout the duration of construction so as to minimize the number of haul trucks per day. Furthermore, similar to the Original Project, in the event of any temporary lane or sidewalk closures, flagmen would be used to control traffic movement during ingress or egress of trucks and heavy equipment from the construction site. Additionally, as with the Original Project, the Modified Project would prepare a Truck Haul Route program as part of the City's permitting process, which will be submitted to the City for review and approval prior to the issuance of a building permit. In addition, in order to minimize potential conflicts between construction activity and through traffic, the Modified Project would include a project design feature requiring a Construction Management Plan to be implemented during construction. Features of the Construction Management Plan may include: limiting potential lane closures to off-peak travel periods, to the extent feasible; maintaining existing access for adjacent uses; prohibiting parking by construction workers on adjacent streets and directing construction workers to utilize on-site or other HSC-designated parking areas; scheduling receipt of construction materials during non-peak travel periods, to the extent feasible; and complying with approved construction traffic control plans that identify traffic control measures, signs, delineators, etc., to be implemented by the construction contractor throughout the duration of construction. With implementation of the Truck Haul Route program, the Construction Management Plan, the off-peak arrival and departure of construction-related trips, and other construction management practices described above, construction traffic impacts would be less than significant under the Modified Project. Such impacts would be within the envelope of impacts addressed in the Certified EIR.

### *(b) Operation*

To evaluate whether the proposed modifications to the Original Project would result in potential traffic impacts, Gibson Transportation Consulting, Inc. reviewed potential traffic conditions associated with the Modified Project as part of the Traffic Memorandum

summarized below and included as Appendix D. A memorandum from the Los Angeles Department of Transportation regarding the proposed modifications is provided as Appendix G. As set forth therein, the specific design details associated with the proposed improvements related to roadway striping, crosswalks, turning radii, and installation of traffic control devices would be subject to review and approval by the Los Angeles Department of Transportation's design staff as part of the Bureau of Engineering's B-permit process.

*(1) Traffic*

As previously described, since preparation of the Certified EIR, the 62,500 square foot Broad Center has been completed and is currently in operation. In addition, the 102,600 square foot HCC III, which includes 92,700 square feet of medical clinic facilities and 9,900 square feet of non-clinical facilities has been proposed and is currently in the site plan review process. Using the same methodology, assumptions, and trip generation rates from the Certified EIR, these two development components are expected to generate a total of 4,096 daily trips, including a total of 300 A.M. and 350 P.M. peak-hour trips. As provided above, the Original Project was anticipated to generate 753 A.M. and 774 P.M. peak-hour trips and a total of 7,715 daily trips. Thus, when accounting for the A.M. and P.M. peak-hour trips generated by these two projects, the number of remaining peak-hour trips available for the Modified Project within the trip envelope analyzed in the Certified EIR would be 453 A.M. and 424 P.M. peak-hour trips or approximately 55 percent of the trip generation forecasted for the Original Project. These remaining peak-hour trips are used in the analysis below to determine whether the development proposed under the Modified Project would be within the peak-hour trips set forth in the Certified EIR.

Additionally, as also described above, other improvement projects currently underway within the HSC include the Los Angeles Department of Water and Power Utilities Project, which involves the undergrounding of all existing overhead communication and energy transmission lines within the HSC; the Norfolk Street extension; and modifications to the in-patient and out-patient circulation system. As previously described, with the Norfolk Street extension, Norfolk Street will be extended from its current eastern terminus at Playground Street to a new intersection with Soto Street. This will provide an additional major access point to the HSC and will be designated as the primary entrance for hospital in-patient visitors. It is anticipated that upon completion of the Norfolk Street extension, 40 percent of the traffic currently entering the HSC via Alcazar Street and 20 percent of the traffic currently entering the HSC via San Pablo Street at Zonal Avenue would shift from those access points to the new gateway at Norfolk Street and Soto Street. Additionally, as part of the modifications to the in-patient and out-patient circulation, use of San Pablo Street between Alcazar Street and Eastlake Avenue/Norfolk Street as an access point would be reduced. While these projects are not a part of the Modified Project, they are described here as they are currently anticipated to be completed and in operation at

buildout of the Modified Project. In addition, the Norfolk Street extension and the modifications to the in-patient and out-patient circulation system, in particular, would modify existing circulation patterns within the HSC. These modifications are accounted for in the traffic analysis provided below.

### Modified Project Traffic

Trip generation forecasts for the Modified Project were prepared for each of the four development options described above in Section III, Project Description, based on the same methodology, trip generation rates of the academic and medical-related facilities, and assumptions used in the Certified EIR.<sup>21</sup> Trip generation rates for the proposed student housing and hotel components were based on the Institute of Transportation Engineers Trip Generation, 8th Edition. Consistent with the Certified EIR, the trip generation forecasts include adjustments for internal capture to account for the synergy between the existing HSC and land uses proposed under the Modified Project. It should be noted that the trip generation estimates are conservative as trip reductions from travel demand management program measures (i.e., USC sponsored shuttles, carpooling programs, transit subsidies, etc.) or transit were not considered. Based on these assumptions, the Traffic Memorandum determined that Option 1 would generate the greatest number of A.M. peak-hour trips, while Option 4 would generate the greatest number of P.M. peak-hour trips. Specifically, Option 1 is forecast to generate a total of 426 net new trips during the weekday A.M. peak hour and Option 4 is forecast to generate 423 P.M. peak-hour trips. Therefore, even when accounting for the most conservative development options, the number of trips under the Modified Project would be below the 453 A.M. and 424 P.M. remaining peak-hour trips entitled for the Modified Project.

It should also be noted that the peak-hour trip generation directional distribution (i.e., inbound and outbound trips) for the Modified Project would be slightly different than the Original Project trip generation. This difference is likely due to the incorporation of the proposed graduate student housing and hotel land uses as compared to development of only medical clinical and research and development uses under the Original Project. The residential-related inbound and outbound trips are such that they would operate counter to the dominant flow of traffic to the campus (i.e., the medical clinical and research and development uses). For example, medical clinic-related traffic would be an inbound during the morning peak hour and outbound during the afternoon peak hour, whereas the student housing traffic would be the opposite with outbound trips during the morning peak hour and

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<sup>21</sup> As indicated in the Traffic Assessment, the year 2010 traffic volumes for most of the selected intersections are consistently lower than the year 2004 traffic volumes during the morning and afternoon peak hours. The higher 2004 traffic volumes contained in the Certified EIR suggest that the ambient traffic growth and projected related projects traffic volumes were overestimated. As such, use of the 2004 traffic count data and associated forecast traffic volumes in the Traffic Assessment is valid and results in a conservative analysis of traffic impacts.

inbound trips during the afternoon peak hour. Regardless, the small number of trips would be distributed throughout the campus and gateways, resulting in a dissipation of traffic at the study intersections. As such, the differences in directional distribution are not anticipated to result in significant impacts at the study intersections based on a review of the level of service (LOS) and increases in the Critical Movement Analysis (CMA) values shown in the Certified EIR.

As the Modified Project also proposes modifications along the majority of the internal roadways, the Traffic Memorandum also included an analysis of the ability of the new roadway configuration to handle the expected traffic levels. This is assessed by calculating the volume-to-capacity (V/C) ratio. As described in the Traffic Memorandum, the V/C ratio is determined by dividing the 24-hour traffic volume by the roadway capacity. The V/C ratio is then used to assess the LOS of the roadway on a scale from LOS A, representing nearly free-flow conditions, to LOS F, representing over-capacity conditions. As previously described, as part of the Modified Project, the majority of the internal HSC roadways would be reclassified to facilitate an orderly traffic circulation pattern around the core of the HSC and minimize pedestrian/vehicular conflicts. In particular, San Pablo Street would be deemphasized, especially between Alcazar Street and Eastlake Avenue/Norfolk Street in order to discourage automobile traffic through the center of the campus. With implementation of the proposed roadway modifications, the distribution pattern of traffic on internal roadways is expected to change. Specifically, the narrowing of San Pablo Street between Alcazar Street and Eastlake Avenue/Norfolk Street would deter many motorists from using this stretch of road and encourage drivers to circulate the roadway system via the loop formed by Alcazar Street, Eastlake Avenue, Norfolk Street, and Playground Street. While the Modified Project would result in a redistribution of traffic within the HSC, the Modified Project would continue to be within the remaining peak-hour trips for the Campus identified in the Certified EIR. In addition, as most roadways would maintain the same number of lanes compared to existing conditions,<sup>22</sup> the Modified Project would not exceed existing roadway capacities.

#### Future Roadway Conditions with Implementation of the Project

As described further in the Traffic Memorandum, in order to ensure that the proposed roadway modifications would provide sufficient capacity to serve the long-term growth of the HSC and other facilities adjacent to HSC, an analysis of future conditions was

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<sup>22</sup> As previously noted, Table 13 of the Traffic Memorandum provided in Appendix D demonstrates that the existing number of lanes would be maintained along most roadway segments, with the exception of the roadway segment at Alcazar Street from San Pablo Street to Playground Street, which would include an additional eastbound traffic lane. Also shown in Table 13 of the Traffic Memorandum, roadway capacities would generally be maintained or increased with the exception of the roadway segment at San Pablo Street from Alcazar Street to Eastlake Avenue/Norfolk Street, which would be reduced due to the removal of the center turn lane separating the northbound and southbound lanes.

also conducted. The future conditions analysis was conservatively based on a 30-year horizon with 3 percent compounding traffic growth each year, for a total of 142 percent growth. The resulting future traffic conditions (with and without the proposed roadway modifications) analysis is provided in Table 14 of the Traffic Memorandum. As provided therein, under future conditions (without the proposed roadway modifications) all roadway segments would operate at an LOS A with the exception of Norfolk Street (between San Pablo Street and Playground Street), which is expected to operate at an LOS D. As shown in Table 14 of the Traffic Memorandum, with the modified roadway classification and dimensions proposed as part of the Modified Project, all of the street segments are anticipated to continue to operate at an LOS A, with the exception of Norfolk Street, which would be improved to a LOS C and LOS B in the eastbound and westbound directions, respectively. Future operations along Alcazar Street from San Pablo Street to Playground Street are also anticipated to improve with the Modified Project.

### Conclusion

Based on the above, it is concluded that any of the Modified Project options could be developed within the trip generation analyzed in the Certified EIR. In addition, it is noted that the Modified Project in combination with the trips generated by the Broad Center and the HCC III would result in fewer P.M. peak-hour trips than analyzed in the Certified EIR. Furthermore, existing and future traffic volumes would be accommodated within the proposed roadway classifications and capacities. As such, development of the Modified Project would not alter the conclusions nor result in any additional impacts or cause a substantial increase in the severity of the traffic impacts of the Certified EIR. As such, traffic impacts associated with the Modified Project would be within the envelope of traffic impacts addressed in the Certified EIR.

#### *(2) Access*

Access to the graduate student housing and hotel site is planned to be provided via San Pablo Street and shared with the driveway to the surface parking lot. Access to HCC III and HCC IV is planned to be provided via driveways along Alcazar Street. As indicated above, the Modified Project is not anticipated to result in significant impacts at the study intersections. Therefore, as with the Original Project, access impacts under the Modified Project would also be less than significant. Such impacts would be within the envelope of impact set forth in the Certified EIR.

#### *(3) Parking*

Parking associated with the Modified Project would be provided such that the total parking requirements for the land uses within the HSC would be satisfied within the total parking supply at the HSC. Therefore, similar to the Original Project, as there would be

parking available within the HSC to meet the anticipated parking demand, parking impacts under the Modified Project would also be less than significant. Such impacts would be within the envelope of impacts addressed in the Certified EIR.

### 3. Mitigation Measures

A traffic mitigation sequencing program was established and outlined in the LADOT assessment letter. Some of the mitigation measures have been completed and several others are underway, as indicated where appropriate below. The balance of the mitigation measures remains applicable to the Modified Project. No additional mitigation measures are required due to the development of the Modified Project.

#### *(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.

**[This mitigation measure set forth in the MMRP and included in the Certified EIR is underway.]**

**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.

**[This mitigation measure set forth in the MMRP and included in the Certified EIR is underway.]**

**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.

**[This mitigation measure set forth in the MMRP and included in the Certified EIR has been completed.]**

**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.

**[This mitigation measure set forth in the MMRP and included in the Certified EIR has been completed.]**

**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.

## **P. Utilities/Service Systems**

### **1. Original Project Impacts**

#### *(a) Water*

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 off-site sources. As such, the impact on treated water from the Los Angeles Department of Water and Power (LADWP) and on adjacent water conveyance systems would be incrementally small. The Original Project would also require construction of water lines from each Development Site for domestic water and for fire sprinkler and suppression systems. Impacts due to construction of water services include minor temporary traffic lane disruption during trenching, laying of pipe, backfilling, and street resurfacing. Standard practices and procedures, including traffic control, are generally implemented by LADWP during construction to reduce the impact to the community. As such, no significant impact to water resources is anticipated to occur during construction of the Original Project and no mitigation measures are necessary.

Operation of the Original Project is anticipated to consume an estimated total of 208,704 to 266,304 gallons per day (gpd) of potable water during the day in which the Original 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. In addition, LADWP has concluded via the Original Project's WSA that adequate water supplies exist to serve the maximum proposed development. Therefore, the water demand of the Original Project would be less than significant in relation to the Urban Water Management Plan and with state water statutes. In addition, the Original Project would not exceed distribution infrastructure capabilities or create a significant impact relative to the existing conveyance system. Furthermore, fire flow would be adequate to meet LAFD requirements. Therefore, the Original Project would generate a less than significant impact in relation to water supply and water conveyance systems.

*(b) Sewer*

During construction, 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. Furthermore, impacts due to construction of lateral lines from the Development Sites to the sewer lines in the public right-of-way would be limited to minor traffic lane disruption. Standard practices and procedures, including traffic control, would be implemented to reduce the impact to the community. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant and no mitigation is required.

Anticipated sewage flow for the Original Project at buildout would range from 163,050 to 208,050 gallons per day. 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. In addition, 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 Site is located in an area designated for commercial and public facility uses, the Original 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. Furthermore, the Applicant would be subject to the payment of a sewerage facilities charge for the development at the Health Sciences Campus. Based on the preceding, no significant impacts in relation to treatment capacity would occur.

The sewer conveyance system serving the Development Sites includes sewer lines in Eastlake Avenue, San Pablo Street, Alcazar Street, Biggy Street, and Zonal Avenue. Since all sewer lines serving the Development Sites have adequate capacity to serve the maximum projected flow from each of the Development Sites, Original Project impacts relative to sewer line capacity is concluded to be less than significant.

*(c) Solid Waste*

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. This total is forecasted to increase to 27.5 million tons in 2015. The 2003 Annual Report to the Los Angeles County Integrated Waste Management Plan concluded 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. With regard to inert landfills, the County's 2003 Annual Report, indicated that based on disposal rates during the preparation of the County's 2003 Annual Report, capacity within existing inert landfills would be available for approximately 60 years (i.e., around 2065). Based on this data, it was concluded that there would be no anticipated shortfall in disposal capacity for inert waste within the County.

Total solid waste generated by all Original Project construction activity is conservatively forecasted to total approximately 28,426 tons. Based on this forecast, Original 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 Original 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 based on the Applicant's construction practices that include recycling of debris.

During 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 Original Project. Of these totals, approximately 6 percent of the solid waste generated would be medical waste that would be treated to acceptable standards prior to landfill disposal. In addition, the Applicant would continue to implement its comprehensive program of recycling municipal solid waste generated at all of its facilities. This program consists of the following three components: (1) recycling; (2) waste to energy; and (3) material recovery. The University is also committed to an ever-expanding recycling program. On an annual basis, the University has met or exceeded the Citywide 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 Original Project. In addition, the Original Project's contribution to the Countywide waste stream 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. 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 Original 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 Original 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. With implementation of the mitigation measures provided below potential impacts would be reduced to a less than significant level.

As the Original Project would implement the policy directives of 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, via the implementation of project design features that are expressly targeted towards solid waste recycling during construction in addition to a comprehensive recycling program that would be implemented during operations, the Original Project would be consistent with the applicable referenced plans and policies, and a less than significant impact would result.

## 2. Modified Project Impacts

### *(a) Water*

As with the Original Project, the majority of water use during construction would be associated with dust suppression for graded and excavated sites. This is generally

performed by water trucks which use non-potable water from off-site sources. As such, the impact on treated water from the Los Angeles Department of Water and Power (LADWP) and on adjacent water conveyance systems would be incrementally small. Thus, like the Original Project, no significant impact to water resources is anticipated to occur during construction of the Modified Project and no mitigation measures are necessary.

With regard to water demand during operations, it was determined that Modified Project Option 1 would consume the greatest amount of water, and thus is the Option that is analyzed below.

Based on the land uses proposed under Option 1 and when accounting for development that has already occurred or is underway, the average domestic water demand would be approximately 251,034 gpd, as shown in Table 8 on page 88. This water demand would be approximately 15,270 gpd less than the Original Project. Like the Original Project, the water demand of the Modified Project would be less than significant in relation to the Urban Water Management Plan. Thus, the Modified Project's impacts on water would be within the envelope of impacts identified in the Certified EIR. In addition, the Modified Project would continue to implement the mitigation measures set forth below for the Original Project.

*(b) Sewer*

As stated above, like the Original Project, during construction, 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. Thus, wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows. 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. Thus, construction-related impacts on wastewater infrastructure and facilities would be less than significant.

With regard to wastewater generation during operations, it was determined that Modified Project Option 1 would generate the greatest amount of wastewater, and thus is the Option that is analyzed below.

Based on the land uses proposed for Option 1 and when accounting for development that has already occurred or is underway, the average wastewater generated under Option 1 would be approximately 196,770 gpd as shown in Table 9 on page 89. This wastewater generation would be approximately 11,280 gpd less than the Original Project. In addition, the same mitigation measures set forth for the Original Project would also be

**Table 8**  
**Estimated Water Demand—Original Project vs. Modified Project**

Land Use	Development	Water Demand Factor	Water Consumption (gpd)	Annual Generation (million gallons)
<b>Original Project</b>				
Academic/Medical Research	720,000 sf	250 gpd/1,000 sf	180,000	65.70
Medical Clinic	45,000 sf	250 gpd/1,000 sf	11,250	4.11
Parking	840,000 sf	20 gpd/1,000 sf	16,800	6.13
Outdoor Water Use			58,254	21.26
<b>Total Original Project</b>			<b>266,304</b>	<b>97.20</b>
<b>Modified Project</b>				
HCC IV Medical Clinical Facilities	27,300 sf	250 gpd/1,000 sf	6,825	2.49
Student Housing				
1 bed, 1 bath studio	20 DU	68 gpd/unit	1,360	0.50
1 bed, 1 bath apartment	35 DU	120 gpd/ unit	4,200	1.53
2 bed, 2 bath apartment	44 DU	238 gpd/ unit	10,472	3.82
3 bed, 3 bath apartment <sup>a</sup>	40 DU	323 gpd/unit	12,920	4.72
4 bed, 4 bath apartment	46 DU	408 gpd/unit	18,768	6.85
Childcare Center	150 students	8 gpd/student	1,200	0.44
Hotel	275 rooms	130 gpd/ room	35,750	13.05
Research and Development	256,000 sf	250 gpd/1,000 sf	64,000	23.36
Outdoor Water Use <sup>b</sup>			54,264	19.81
<b>Total Modified Project</b>			<b>209,759</b>	<b>76.57</b>
<b>HSC Projects Constructed and Underway</b>				
Broad Center	62,500 sf	250 gpd/1,000 sf	15,625	5.70
HCC III Medical Clinical Facilities	92,700 sf	250 gpd/1,000 sf	23,175	8.46
HCC III Non-Clinical Facilities	9,900 sf	250 gpd/1,000 sf	2,475	0.90
<b>Total HSC Projects Constructed and Underway</b>			<b>41,275</b>	<b>15.06</b>
<b>Total Modified Project Option 1 including HSC Projects Constructed and Underway</b>			<b>251,034</b>	<b>91.63</b>
<p>Numbers may not be exact due to rounding.</p> <p><sup>a</sup> Three-bed, 3-bath apartment is a prorated generation factor based on the average between a 2-bedroom and 4-bedroom apartment generation factor.</p> <p><sup>b</sup> To be consistent with the USC Health Sciences Campus Project (May 2005), outdoor water use is assumed to be 28 percent of the forecasted daily Modified Project water consumption.</p> <p>Source: Matrix Environmental, 2013.</p>				

**Table 9**  
**Estimated Annual Wastewater Generation—Original Project vs. Modified Project**

Land Use	Development	Wastewater Demand Factor	Wastewater Generation (gpd)	Annual Generation (million gallons)
<b>Original Project</b>				
Academic/Medical Research	720,000 sf	250 gpd/1,000 sf	180,000	65.70
Medical Clinic	45,000 sf	250 gpd/1,000 sf	11,250	4.11
Parking	840,000 sf	20 gpd/1,000 sf	16,800	6.13
<b>Total Original Project</b>			<b>208,050</b>	<b>75.94</b>
<b>Modified Project</b>				
HCC IV Medical Clinical Facilities	27,300 sf	250 gpd/1,000 sf	6,825	2.49
Student Housing				
1 bed, 1 bath studio	20 DU	68 gpd/unit	1,360	0.50
1 bed, 1 bath apartment	35 DU	120 gpd/ unit	4,200	1.53
2 bed, 2 bath apartment	44 DU	238 gpd/ unit	10,472	3.82
3 bed, 3 bath apartment <sup>a</sup>	40 DU	323 gpd/unit	12,920	4.72
4 bed, 4 bath apartment	46 DU	408 gpd/unit	18,768	6.85
Childcare Center	150 students	8 gpd/student	1,200	0.44
Hotel	275 rooms	130 gpd/ room	24,050	13.05
Research and Development	256,000 sf	250 gpd/1,000 sf	64,000	23.36
<b>Total Modified Project</b>			<b>155,495</b>	<b>56.76</b>
<b>HSC Projects Constructed and Underway</b>				
Broad Center	62,500 sf	250 gpd/1,000 sf	15,625	5.7
HCC III Medical Clinical Facilities	92,700 sf	250 gpd/1,000 sf	23,175	8.46
HCC III Non-Clinical Facilities	9,900 sf	250 gpd/1,000 sf	2,475	0.90
<b>Total HSC Projects Constructed and Underway</b>			<b>41,275</b>	<b>15.06</b>
<b>Total Modified Project Option 1 including HSC Projects Constructed and Underway</b>			<b>196,770</b>	<b>71.82</b>
<p><i>Note: Numbers may not be exact due to rounding.</i></p> <p><sup>a</sup> 3 bed, 3 bath apartment is a prorated generation factor based on the average between a 2 bedroom and 4 bedroom apartment generation factor.</p> <p>Source: Matrix Environmental, 2013.</p>				

implemented under the Modified Project. Therefore, impacts associated with wastewater facilities would be less than significant and such impacts would be within the envelope of impacts identified in the Certified EIR.



*(c) Solid Waste*

As with the Original Project, construction of the Modified Project would result in demolition and construction debris. Like the Original Project, some of the construction waste generated under the Modified Project would be disposed of at unclassified landfills. The unclassified landfills that would accept such materials have sufficient capacity to accommodate the disposal of materials associated with construction activities. Therefore, as with the Original Project, the Modified Project would result in less than significant solid waste impacts during construction.

With regard to solid waste generation during operations, it was determined that Modified Project Option 1 would generate the greatest amount of solid waste annually, and thus is the Option that is analyzed below.

As shown in Table 10 on page 91, the Original Project would generate approximately 423.7 tons of solid waste per year. In comparison, Option 1 would generate approximately 1,536.25 tons of solid waste annually. In addition, when accounting for the HSC projects constructed and underway (Broad Center and HCC III) the Modified Project would generate a total of approximately 1,549.77 tons of solid waste annually. As such, similar to the Original Project, impacts to Class III solid waste disposal facilities would be considered potentially significant under the Modified Project.

However, the solid waste anticipated to be generated by Modified Project Option 1 (including the Broad Center and HCC III) would account for only 0.0082 percent of the 19.5 million tons of solid waste generated in the Los Angeles County in 2010. In addition, it is noted that since 2003 the overall County of Los Angeles generation rate has decreased 18.1 percent. Therefore, it is anticipated that the existing and planned landfills/improvements identified in the County Integrated Waste Management Plan 2010 Annual Report would be able to accommodate the Modified Project-generated waste. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's Solid Waste Integrated Resources Plan objective to achieve a 70 percent diversion goal by 2015. In addition, like the Original Project, the Modified Project would implement mitigation measures to reduce the amount of solid waste generated within the Project Site. As such, though the Modified Project would generate more solid waste compared to the Original Project, impacts regarding solid waste generation and disposal under the Modified Project would be less than significant.

As with the Original Project, the Modified Project would comply with Senate Bill 1374 (Construction and Demolition Waste Materials: Diversion Requirements). In addition, the Modified Project would comply with federal, state, and local statutes and regulations related to solid waste including the City's Solid Waste Integrated Resources Plan, City's General

**Table 10**  
**Estimated Annual Solid Waste Generation—Original Project vs. Modified Project**

Land Use	Development	Solid Waste Factor	Waste (lbs per year)	Waste (tons per year)
<b>Original Project</b>				
Municipal Solid Waste	765,000 sf	4.08 lbs/1,000 sf/day	811,486	405.8
Medical Solid Waste	765,000 sf	0.18 lbs/1,000 sf/day	35,802	17.9
<b>Total Original Project</b>			<b>847,314</b>	<b>423.7</b>
<b>Modified Project Option 1</b>				
HCC IV Medical Clinical Facilities	27,300 sf	0.18 lbs/1,000 sf/ day	1,277.64	0.639
Student Housing	185 DU	12.23 lbs/household/day	825,830.75	412.92
Childcare Center	11,560 sf	0.0007 lbs/sf/ day	2,103.92	1.052
Hotel <sup>a</sup>	275 rm	5,049 lbs/employee/day	1,731,807	865.90
Research and Development	256,000 sf	1,998 lbs/1,000 sf/day	511,488	255.744
<b>Total Modified Project</b>			<b>3,072,507.31</b>	<b>1,536.25</b>
<b>HSC Projects Constructed and Underway</b>				
Broad Center	62,500 sf	0.18 lbs/1,000 sf/day	2,925	1.46
HCC III Medical Clinical Facilities	92,700 sf	0.18 lbs/1,000 sf/day	4,338.36	2.17
HCC III Non-Clinical Facilities	9,900 sf	1,998 lbs/household/day	19,780.2	9.89
<b>Total HSC Projects Constructed and Underway</b>			<b>27,043.56</b>	<b>13.52</b>
<b>Total Modified Project Option 1 including HSC Projects Constructed and Underway</b>			<b>3,099,550.87</b>	<b>1,549.77</b>
<p>Numbers may not be exact due to rounding.  sf = square feet  DU = dwelling units  rm = rooms  <sup>a</sup> Anticipated number of employees was calculated based on a factor of 1.246 employees per room.  Source: Matrix Environmental, 2013.</p>				

Plan Framework Element, RENEW LA Plan, and Green LA Plan. Furthermore, since the certification of the EIR, the City achieved a diversion rate of 65 percent, exceeding the 50 percent diversion rate required by AB 939.<sup>23</sup> In addition, implementation of mitigation measures would facilitate recycling on-site and help to ensure that the Project's impact on regional solid waste disposal capacity is minimized. As such, as with the Original Project, the Modified Project's impacts associated with solid waste plans and policies would be less than significant.

<sup>23</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation. Solid Resources: Recycling Information, [http://lacitysan.org/solid\\_resources/recycling/index.htm](http://lacitysan.org/solid_resources/recycling/index.htm), accessed October 31, 2011.

As with the Original Project, the Modified Project would comply with Senate Bill 1374 (Construction and Demolition Waste Materials: Diversion Requirements). In addition, the Modified Project would comply with federal, state, and local statutes and regulations related to solid waste including the City's Solid Waste Integrated Resources Plan, City's General Plan Framework Element, RENEW LA Plan, and Green LA Plan. Furthermore, since the certification of the EIR, the City achieved a diversion rate of 65 percent, exceeding the 50 percent diversion rate required by AB 939.<sup>24</sup> In addition, implementation of mitigation measures would facilitate recycling on-site and help to ensure that the Project's impact on regional solid waste disposal capacity is minimized. As such, as with the Original Project, the Modified Project's impacts associated with solid waste plans and policies would be less than significant.

### 3. Mitigation Measures

The mitigation measures set forth in the Certified EIR and provided below remain applicable to the Modified Project. No additional mitigation measures are required due to the development of the Modified Project.

#### *(a) Water*

**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.

#### *(b) Sewer*

**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.

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<sup>24</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation. *Solid Resources: Recycling Information*, [http://lacitysan.org/solid\\_resources/recycling/index.htm](http://lacitysan.org/solid_resources/recycling/index.htm), accessed October 31, 2011.

**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.

*(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.

**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.

## VI. Conclusion

As demonstrated by the discussion above, and as summarized in Table 11 on page 94, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. Thus, a new or greater significant impact would not result from the proposed modifications. In addition, all of the mitigation measures

**Table 11**  
**Comparison of Impacts Under Original Project and Modified Project**

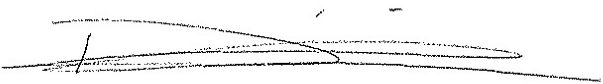
<b>Issue</b>	<b>Original Project</b>	<b>Modified Project</b>
<b>Visual Resources</b>		
<i>Construction</i>	Less than Significant	Less than Significant
<i>Operation</i>	Less than Significant	Less than Significant
<b>Agriculture Resources</b>	No Impact	No Impact
<b>Air Quality and Greenhouse Gas Emissions</b>		
<i>Construction</i>		
<i>Regional Emissions</i>	Significant and Unavoidable	Significant and Unavoidable
<i>Localized Emissions</i>	Significant and Unavoidable	Less Than Significant with Mitigation
<i>Operation</i>		
<i>Regional Emissions</i>	Significant and Unavoidable	Significant and Unavoidable
<i>Localized Emissions</i>	Less Than Significant	Less Than Significant
<i>Greenhouse Gas Emissions</i>	N/A*	Less than Significant
<b>Biological Resources</b>	Less than Significant	Less than Significant
<b>Cultural Resources</b>	Less than Significant	Less than Significant
<b>Geology and Soils</b>	Less than Significant	Less than Significant
<b>Hazards and Hazardous Materials</b>	Less than Significant	Less than Significant
<b>Surface Hydrology and Water Quality, and Groundwater</b>		
<i>Hydrology</i>	Less than Significant	Less than Significant
<i>Surface Water Quality</i>	Less than Significant	Less than Significant
<i>Groundwater</i>	Less than Significant	Less than Significant
<b>Land Use and Planning</b>		
<i>Consistency with Applicable Plans</i>	Less than Significant	Less than Significant
<i>Project Compatibility with Surrounding Land Uses</i>	Less than Significant	Less than Significant
<b>Mineral Resources</b>	No Impact	No Impact
<b>Noise</b>		
<i>Construction</i>	Significant and Unavoidable	Significant and Unavoidable
<i>Operation</i>	Less than Significant	Less than Significant
<b>Population and Housing</b>	Less than Significant	Less than Significant
<b>Public Services</b>		
<i>Fire</i>	Less than Significant	Less than Significant
<i>Police</i>	Less than Significant	Less than Significant
<i>Schools</i>	Less than Significant	Less than Significant
<i>Parks</i>	Less than Significant	Less than Significant
<i>Libraries and Other Public Services</i>	Less than Significant	Less than Significant

**Table 11 (Continued)**  
**Comparison of Impacts Under Original Project and Modified Project**

<b>Issue</b>	<b>Original Project</b>	<b>Modified Project</b>
<b>Recreation</b>	Less than Significant	Less than Significant
<b>Traffic, Circulation, and Parking</b>		
<i>Construction</i>	Less than Significant	Less than Significant
<i>Operation</i>		
<i>Traffic</i>	Significant and Unavoidable	Significant and Unavoidable
<i>Access</i>	Less than Significant	Less than Significant
<i>Parking</i>	Less than Significant	Less than Significant
<b>Utilities/Service Systems</b>		
<i>Water</i>	Less than Significant	Less than Significant
<i>Sewer</i>	Less than Significant	Less than Significant
<i>Solid Waste</i>	Less than Significant	Less than Significant
<p><i>*Until the passage of AB 32 in 2006, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. In addition, subsequent to the completion of the Original Project's Certified EIR, the state's Office of Planning and Research's recommended amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009. The Draft Environmental Impact Report for the USC Health Sciences Project was completed in May 2005.</i></p> <p><i>Source: Matrix Environmental, 2013.</i></p>		

included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts would be within the envelope of impacts analyzed in the Certified EIR, no additional environmental analysis of the Modified Project is necessary.

The City of Los Angeles Planning Department has reviewed this Addendum and has determined it to be prepared in accordance with all CEQA requirements and in so doing adequately addresses the potential environmental impacts of the Modified Project. Therefore, this Addendum is adequate under CEQA and can be used by an agency making a decision on the Project.

  
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Diana Kitching  
Los Angeles Department of City Planning

3/28/13  
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Date