

2.0 COMMENTS AND RESPONSES

Section 15088(a) of the State CEQA Guidelines states that: "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this Chapter of this Final EIR provides responses to each of the written comments on the Draft EIR received during the public comment period. **Table 2-1, Summary of Comments on the Harbor-UCLA Medical Center Campus Master Plan Project Draft EIR**, which starts on page 2-2, provides a list of the comment letters received and a summary of the issues raised in response to the Draft EIR.

The letters received during the public comment period are provided within this section and are summarized below in Table 2-1. Comments were received from State agencies, County agencies and departments or divisions, and City departments, as well as from individuals and organizations. As indicated in Table 2-1, the individual letters are organized by State, Regional, City, organization, and then individuals. Each comment that requires a response is also assigned a number. For example, the first comment later is from the State of California Governor's Office of Planning and Research, which will be labeled "Letter No. 1." Accordingly, the first comment from the letter is labeled "Comment No. 1-1" and the corresponding response provided is labeled "Response No. 1-1". Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR.

As required by the State CEQA Guidelines, Section 15088 (c), the focus of the responses to comments is on "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided to comments that do not relate to environmental issues.

Table 2-1

Summary of Comments on the Harbor-UCLA Medical Center Campus Master Plan Project Draft EIR

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	AESTHETICS/VISUAL RESOURCES	AIR QUALITY/GREENHOUSE GAS EMISSIONS	PALEONTOLOGICAL/ ARCHEOLOGICAL RESOURCES	GEOLOGY AND SOILS	HISTORICAL RESOURCES	HAZARDS	HYDROLOGY /WATER QUALITY	LAND USE	NOISE	POPULATION/HOUSING/ EMPLOYMENT	TRANSPORTATION/PARKING	PUBLIC SERVICES	UTILITIES	ALTERNATIVES	SUPPORT	OTHER COMMENTS
1	State of California Governor’s Office of Planning and Research Scott Morgan, Director State Clearinghouse and Planning Unit 1400 10 th Street, P.O. Box 3044 Sacramento, CA 95812-3044	X																X
2	California Department of Transportation Dianna Watson Branch Chief, Community Planning & LD/IGR Review District 7 – Office of Transportation Planning 100 S. Main Street, MS 16 Los Angeles, CA 90012								X			X						

Table 2-1 (Continued)

Summary of Comments on the Harbor-UCLA Medical Center Campus Master Plan Project Draft EIR

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	AESTHETICS/VISUAL RESOURCES	AIR QUALITY/GREENHOUSE GAS EMISSIONS	PALEONTOLOGICAL/ ARCHEOLOGICAL RESOURCES	GEOLOGY AND SOILS	HISTORICAL RESOURCES	HAZARDS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION/HOUSING/ EMPLOYMENT	TRANSPORTATION/PARKING	PUBLIC SERVICES	UTILITIES	ALTERNATIVES	SUPPORT	OTHER COMMENTS
3	County of Los Angeles Metropolitan Transportation Authority Elizabeth Carvajal Sr. Manager, Transportation Planning Metro Development Review One Gateway Plaza MS 99-23-4 Los Angeles, CA 90012-2952												X					
4	County of Los Angeles Department of Parks and Recreation Kathline J. King, AICP Chief of Planning Planning and Development Agency 510 South Vermont Avenue Los Angeles, CA 90020-1975													X				

Table 2-1 (Continued)

Summary of Comments on the Harbor-UCLA Medical Center Campus Master Plan Project Draft EIR

LETTER NO.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	AESTHETICS/VISUAL RESOURCES	AIR QUALITY/GREENHOUSE GAS EMISSIONS	PALEONTOLOGICAL/ ARCHEOLOGICAL RESOURCES	GEOLOGY AND SOILS	HISTORICAL RESOURCES	HAZARDS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION/HOUSING/ EMPLOYMENT	TRANSPORTATION/PARKING	PUBLIC SERVICES	UTILITIES	ALTERNATIVES	SUPPORT	OTHER COMMENTS
5	County of Los Angeles Fire Department Kevin T. Johnson Acting Chief, Forestry Division Prevention Services Bureau 1320 North Eastern Avenue Los Angeles, CA 90063-3294				X				X					X				X
6	County Sanitation Districts of Los Angeles County Adriana Raza, Customer Service Specialist Facilities Planning Department 1955 Workman Mill Road Whittier, CA 90601-1400														X			
7	City of Carson Zak Gonzalez II, Associate Planner 701 E. Carson Street Carson, CA 90745	X										X	X					X
8	Linda Ko lindako412@gmail.com							X										

LETTER 1



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 30, 2016

Clarice Nash
Los Angeles County
Dept. of Public Works
900 S. Fremont Avenue
Alhambra, CA 91803

Subject: Harbor-UCLA Medical Center Campus Master Plan Project
SCH#: 2014111004

Dear Clarice Nash:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 29, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. | 1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in black ink that reads "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014111004
Project Title Harbor-UCLA Medical Center Campus Master Plan Project
Lead Agency Los Angeles County

Type EIR Draft EIR

Description The proposed Harbor UCLA Medical Center Campus Master Plan Project involves the multi-phased development of hospital, outpatient, research, and support facilities through the year 2030. The existing 72-acre Harbor-UCLA Campus, located at 1000 West Carson St in Torrance, CA, currently includes 1,279,284 sf of developed floor area, including a recently completed Surgery and Emergency Room replacement project. The master plan project, which will be developed into a total of approximately 2,457,355 sf of developed floor area, will include development of a new hospital tower to meet increasing state law seismic requirements for acute care facilities, renovation of the existing hospital tower to house non-acute care support uses, and replacement of aging facilities. The western side of the medical center campus is the proposed location for a new Bioscience Tech Park of up to 250,000 sf and would support open space, surface parking, and other similar ancillary short term uses.

Lead Agency Contact

Name Clarice Nash
Agency Los Angeles County
Phone 626 300-2363 **Fax**
email
Address Dept. of Public Works
900 S. Fremont Avenue
City Alhambra **State** CA **Zip** 91803

Project Location

County Los Angeles
City Torrance
Region
Lat / Long
Cross Streets Carson Street at S. Vermont Avenue
Parcel No. 7344-001-901
Township **Range** **Section** **Base**

Proximity to:

Highways I-405, I-110
Airports
Railways UPRR, BNSF
Waterways Dominguez Channel
Schools Several
Land Use GP: Public and Semi-Public
Z: C-3 Unlimited Commercial/TOD

Project Issues Aesthetic/Visual; Air Quality; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

LETTER 1

State of California
Governor's Office of Planning and Research
Scott Morgan, Director
State Clearinghouse and Planning Unit
1400 10th Street, P.O. Box 3044
Sacramento, CA 95812-3044
(September 30, 2016)

Response 1-1

Thank you for your letter acknowledging that State OPR received the Draft EIR for review and distribution. The letter further acknowledges that no state agencies had submitted comments by the close of the comment period, and that the County has complied with the State Clearinghouse CEQA review requirements.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-9140
 FAX (213) 897-1337
 www.dot.ca.gov

LETTER 2

*Serious drought.
 Help save water!*

October 5, 2016

Ms. Clarice Nash
 County of Los Angeles
 Department of Public Work
 900 S. Fremont Avenue
 Alhambra, CA 91803

RE: Harbor-UCLA Medical Center
 Campus Master Plan Project
 Vic. LA-110/PM 7.02, LA-213/PM 7.98
 LA-405/PM 10.54
 SCH # 2004111004
 Ref. IGR/CEQA No. 141114AL-NOP
 LA-2016-00100-AL-DEIR

Dear Ms. Nash:

Thank you for accepting Caltrans' comment per your conversation with Mr. Alan Lin, project coordinator, on October 4, 2016. The proposed project would add an additional 1,178,071 square feet to the existing 1,279,284 square feet of existing developed floor area, for a total at build out of up to 2,457,355 square feet of developed floor area on the Harbor-UCLA Campus. 1

The Project would generate an estimated net external 1,620 daily trips, including 200/197 trips in AM/PM peak hours in the 2023 Project phase. During the 2030 Project phase, the project would generate an estimated net external 6,598 daily trips, including 637/732 trips in the AM/PM peak hours. There are 26 related projects in the project vicinity, therefore cumulative impacts may occur. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future. 2

The Traffic Impact Study concluded that the proposed project + cumulative will impact the following State intersections:

Location #9 - I-110 Southbound Ramps & Carson St.
 Location #15 - Figueroa Street and 220th St. /I-110 Northbound Ramps
 Location #20 - I-110 Southbound Ramps and 223rd St.

Location #9 (51.9% Fair share Contribution): The mitigation would involve restriping the southbound approach on the Interstate I-110 off-ramp to convert the left-turn lane to a left-/right-turn lane. Caltrans proposes to convert the southbound off-ramp controlled right-turn lane to a free flow right-turn lane by installing protected raised right-turn median and installing additional westbound travel auxiliary) lane from off-ramp to Vermont Avenue. The traffic signal and ADA 3

access should be upgraded to latest State standards.

Location #15 (31.1% Fair Share Contribution): the mitigation would involve striping an additional northbound through lane and restriping the existing through lane as a through/right-turn lane. The eastbound approach would be restriped from the existing through/left-turn lane and right to a left-turn lane and through/right-turn lane. Caltrans concurs with the proposed mitigation measure at this location. However, cross walk enhancement is required.

Location #20 (75.7% Fair Share Contribution): the mitigation would involve restriping the eastbound and southbound approaches. The southbound approach would be modified from the existing left-turn/through and right-turn/through lanes to a right-turn lane and left-turn/through/right-turn lane. The eastbound approach would be restriped to change the existing right-turn lane to a through/right-turn lane. Parking would be removed on 223rd St., between the Interstate I-110 Bridge and Figueroa St., and converted to a dedicated right-turn lane. We proposed the possibilities of widening the southbound off-ramp for additional right-turn lane. The eastbound approach proposed restriping to be further investigated based on 3 day traffic counts. The traffic signal and ADA should be upgraded to latest State standards.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

Caltrans will work with the Lead Agency in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to LA-2016-00100-AL-DEIR.

Sincerely,



DIANNA WATSON
Branch Chief
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

LETTER 2

California Department of Transportation
Dianna Watson
Branch Chief, Community Planning & LD/IGR Review
District 7 – Office of Transportation Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012
(October 5, 2016)

Response 2-1

This introductory comment acknowledges the courtesy of providing the agency a requested two day extension to provide its comment and notes the increase in campus square footage proposed to be built out by the proposed Project .

Response 2-2

This comment summarizes the Project-related overall trip generation and peak hour trips, as well as conclusions regarding cumulative impacts to Caltrans-controlled facilities, as stated in the Draft EIR, and indicates that the County's decision makers should be aware of the determinations regarding cumulative impacts and consider mitigation for future cumulative traffic impacts. Specifically, as noted by the commenter, the Draft EIR concludes in Section 4.L, Transportation and Traffic, that significant unavoidable cumulative traffic impacts would result from Project implementation at three (3) locations partly under the control of Caltrans, including Intersection #9 (I-110 Southbound Ramps at Carson Street), Intersection #15 (220th Street/I-110 Northbound Ramps at Figueroa Street), and Intersection #20 (I-110 Southbound Ramps at 223rd Street). As also noted in Section 4.L, mitigation in the form of intersection-specific improvements (per Mitigation Measures TRAF-1 through TRAF-3) are considered infeasible due to uncertainties regarding their implementation since these facilities are not wholly under the control of the County. Investigation of potential mitigation measures were conducted as described in Section 4.L, including potential fair share contributions, but in the absence of specific improvements linked to a reasonable mitigation plan tied to actual mitigation of the impacts, no fair share contribution can be calculated or made as an adequate mitigation measure. Therefore, impacts to these intersections were concluded to be significant and unavoidable in the EIR. This conclusion does not preclude the County from coordinating with Caltrans regarding potential future improvements at these locations.

Response 2-3

This comment summarizes Mitigation Measure TRAF-1 to address impacts to Intersection #9 at the southbound I-110 off-ramps at Carson Street, which involves restriping to allow additional right turn movements onto westbound Carson Street, subject to approval by Caltrans. The comment further states that Caltrans proposes improvements at this location involve construction of a raised median and provision of a free right-turn lane onto westbound Carson Street and an additional travel lane (an auxiliary lane) for westbound traffic from I-110 to Vermont Avenue. This change would require elimination of on-street parking on the north side of Carson Street at this location. Similar to the proposed mitigation measure, Caltrans' proposal would increase right-turn capacity on the off-ramp. As described, it would preclude implementation of proposed Mitigation Measure TRAF-1. As suggested by the comment, any intersection improvements at this location would also be required to meet current State standards for traffic signals and

ADA access. In light of the uncertainty regarding potential improvements at this location, which is under the partial control of Caltrans, impacts at this location would continue to be considered significant and unavoidable for purposes of a conservative analysis in the Draft EIR. This conclusion does not preclude the County from coordinating with Caltrans regarding potential future improvements at these locations.

Response 2-4

This comment summarizes and concurs with proposed Mitigation Measure TRAF-2 to address impacts to Intersection #15 at the northbound I-110 ramps/220th Street and Figueroa Street, which is subject to approval by Caltrans and the City of Carson, but adds that crosswalk enhancements would also be required. Any such crosswalk enhancements at this location would be required to comply with current ADA or other accessibility standards, as noted by the commenter. While Caltrans concurs with this mitigation measure to address Project-related impacts at this location, in light of uncertainty regarding the timing and feasibility of the improvements, which are under the control of Caltrans and the City of Carson, impacts at this location would continue to be considered significant and unavoidable for purposes of a conservative analysis in the Draft EIR. Nonetheless, despite the conclusion that impacts to these facilities would be significant and unavoidable due to these circumstances, the County may still coordinate with Caltrans in the future regarding potential improvements that Caltrans may undertake to address impacts at this location.

Response 2-5

This comment summarizes proposed Mitigation Measure TRAF-3 to make specific intersection modifications to address impacts to Intersection #20 at the I-110 Southbound Ramps and 223rd Street, subject to approval by Caltrans. While Caltrans does not disagree with this mitigation measure to address Project-related impacts at this location, this comment indicates that Caltrans proposes consideration of constructing an additional right-turn lane on the southbound off-ramp at 223rd Street. The comment further suggests that additional investigation should be conducted to determine the feasibility of modifying the eastbound approach to this intersection. It should be noted that Carson Street at this location is under the control of the County of Los Angeles, and thus Caltrans and the County Department of Public Works, Division of Traffic & Street Lighting, should coordinate regarding future improvements. As suggested by the commenter, however, any intersection improvements at this location would be required to meet current State standards for traffic signals and ADA access. As such, given the uncertainty regarding the timing and feasibility of the improvements, which are under the control of Caltrans, impacts at this location would continue to be significant and unavoidable for purposes of a conservative analysis in the Draft EIR. Nonetheless, despite the conclusion that impacts to these facilities would be significant and unavoidable due to these circumstances, the County may still coordinate with Caltrans in the future regarding potential improvements that Caltrans may undertake to address impacts at this location.

Response 2-6

This comment describes stormwater runoff impacts from development projects as a sensitive issue which needs to be addressed and that storm water runoff may not be discharged onto a state highway facility without a storm water management plan.. Section 4.G, Hydrology and Water Quality, of the Draft EIR provides information regarding the Project's stormwater runoff impacts and relevant regulations about water quality standards. The Project would comply with all applicable requirements and permits related to stormwater management and water quality. Therefore, impacts related to stormwater runoff and discharge would be less than significant. In regards to the discharge of stormwater runoff onto State highway facilities,

according to the Harbor-UCLA Campus Master Plan⁸, The County of Los Angeles Flood Control District owns and maintains the 208th Street Storm Drain which runs through Harbor-UCLA in a 15-foot wide easement. This storm drain line runs through the site in the north-south direction as an 8-foot high by 4-foot wide reinforced concrete box culvert (RCB). Near 220th Street, it turns westerly and flows as an open channel in an easement toward Normandie Avenue. It joins with the 15.7-mile-long Dominguez Channel which begins in the City of Hawthorne and eventually discharges to the east basin of the Los Angeles Harbor. Therefore, there will also be no discharge of stormwater runoff onto State highway facilities.

Response 2-7

This comment states that transportation of heavy construction equipment and/or materials that will require over-sized transport vehicles on State highways will require a permit from Caltrans. Section 4.I, Traffic and Transportation, of the Draft EIR provides PDF-TRAF 1: Construction Traffic Management Plan, which states that a detailed Construction Traffic Management Plan will include street closure information, detour plans, and haul routes. All construction-related deliveries, including haul trips, will be scheduled to occur outside of the commuter peak hours to the extent feasible. The Project would comply with County or respective City requirements regarding haul routes. If oversized transport is required, a transportation permit would be obtained from Caltrans.

Response 2-8

This comment offers to continue to work with the lead agency, and the County appreciates the cooperation on this important public Project.

⁸ County of Los Angeles, 2012. Harbor-UCLA Medical Center Campus Master Plan. http://ridley-thomas.lacounty.gov/PDFs/20120630_HARBOR%20UCLA%20MASTER%20PLAN.pdf, accessed 12/11/15

LETTER 3



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

September 28, 2016

Clarice Nash, Project Manager
County of Los Angeles Department of Public Works
Project Management Division I
900 S. Fremont Ave.
Alhambra, CA 91803-1331

RE: Harbor-UCLA Medical Center Campus Master Plan Project – County of Los Angeles – Notice of Availability of a Draft Environmental Impact Report

Dear Ms. Nash:

Thank you for the opportunity to comment on the Harbor-UCLA Medical Center Campus Master Plan Project located at 1000 West Carson Street in the City of Torrance. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Project Description:

Los Angeles County proposes the Harbor-UCLA Medical Center Campus Master Plan Project to consider current conditions and future needs of the Harbor-UCLA Medical Center Hospital and Clinics, the LA Biomed Research Foundation, and the Department of Health Services at the Medical Campus. The project would be a redesign of the existing County of Los Angeles Harbor-UCLA Campus to address the future needs of the communities served by the County of Los Angeles Harbor-UCLA Campus. The existing 72-acre Harbor-UCLA Campus, located at 1000 West Carson Street in Torrance, California, currently includes 1,279,284 square feet of developed floor area, including a recently completed Surgery and Emergency Room Replacement Project. The Master Plan Project, which will be developed into a total of approximately 2,457,355 square feet of developed floor area, will include development of a new Hospital tower to meet increasing state law seismic requirements for acute care facilities, renovation of the existing Hospital tower to house non-acute care support uses, replacement of aging facilities, reconfigured vehicular and pedestrian access to and circulation within the Harbor-UCLA Campus, and implementation of a cohesive site design that enhances the experience of staff, patients, and visitors. The redesigned Medical Center Campus would consolidate outpatient facilities and locate them in proximity to the New Hospital Tower in the north-central portion of the Medical Center Campus. The western side of the Medical Center Campus is the proposed location for a new Bioscience Tech Park of up to 250,000 square feet and would support open space, surface parking, and other similar ancillary short-term issues.

1

2

Metro Comments:

Bus Operations:

Metro bus lines 550 and 205 operate on W Carson St and S Vermont Ave, adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus services that are present. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

3

Transit Orientation:

To support first/last mile connections to transit service, LACMTA encourages the installation of pedestrian lighting, shade trees, enhanced crosswalks with ADA-compliant ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access bus stops. The City should consider requesting the installation of such amenities as part of the development of the site.

4

Active Transportation:

1. Provide safe and convenient connections for pedestrians, people riding bicycles, and users of Metro systems and other transit services to and from the project. Consider the following:
 - a. Add pedestrian crossings at campus entries identified in Figure 2-9 of the DEIR that coincide with pedestrian circulation routes. These may include Normandie Ave/Medical Foundation Dr, 220th St/Research Park Dr, 220th St/Meyler St, Vermont Ave/Lot C driveway, etc.

5

Congestion Management Program:

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

6

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

6
CONT

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. **Metro looks forward to reviewing the Final EIR. Please send it to the following address:**

7

**Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952**

Sincerely,



Elizabeth Carvajal
Sr. Manager, Transportation Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

LETTER 3

County of Los Angeles Metropolitan Transportation Authority
Elizabeth Carvajal
Sr. Manager, Transportation Planning
Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952
(September 28, 2016)

Response 3-1

This comment provides an introduction to the comments contained in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 3-3 through 3-6.

Response 3-2

This comment provides a summary of the proposed improvements as discussed in the Chapter 2.0, Project Description, of the Draft EIR.

Response 3-3

This comment indicates the County should be aware of adjacent Metro Bus lines 550 and 205, and acknowledges that the Project would not result in any significant long-term impacts on public transit. The EIR describes these lines in the section titled Public Transit and Alternative Transportation Facilities in Section 4.L and Figure 4.L-2 showing Existing Transit Lines includes these along with others from Torrance, Gardena, and Carson serving the Project vicinity.

The comment further suggests that future Project-related construction be coordinated with Metro in order to minimize disruptions or other temporary effects on transit services and facilities in the Project area. As such, prior to implementation of future Project-related improvements that could potentially affect transit services or facilities in the Project area, the County Department of Public Works would coordinate construction activities with Metro. This comment does not raise any substantive issues regarding the analysis or conclusions presented in the Draft EIR, and thus no further responses is necessary.

Response 3-4

This comment suggests that the County consider the installation of pedestrian lighting, shade trees, enhanced crosswalks with ADA-compliant ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access bus stops as part of the development of the site. As discussed on pages 4.L-79 and 4.L-80 in Section 4.L, Transportation and Traffic, of the Draft EIR, the proposed improvements under the Master Plan Project would implement various pedestrian-related features and improve non-vehicular access throughout the Medical Center Campus, which is consistent with Metro's suggestions..

Response 3-5

This comment suggests that in order to provide safe and convenient connections for pedestrians, cyclists, and public transit patrons, the County should consider adding pedestrian crossings at Medical Center Campus entry points identified in Figure 2-9 of the Draft EIR that coincide with pedestrian circulation routes, which could include Normandie Avenue/Medical Foundation Drive, 220th Street/Research Park Drive, 220th Street/Meyler Street, Vermont Avenue/Parking Lot C driveway, or other locations. As discussed on page 4.L-80 in Section 4.L, Transportation and Traffic, of the Draft EIR, the proposed circulation improvements at the Medical Center Campus, both vehicular and non-vehicular, would be designed to provide separation between pedestrians/bicyclist and motor vehicles in order to minimize potential conflicts and associated hazards. As such, given implementation of Master Plan design principles and proposed circulation plan components, it is anticipated that vehicular circulation, bicycle and pedestrian safety, and both vehicular and non-vehicular access and circulation on-site would not only maintained but substantially improved relative to existing conditions as no unified, comprehensive circulation system currently exists on the Medical Center Campus. Furthermore, all access points and on-site circulation improvements, which could include pedestrian crossings and other pedestrian safety improvements at the various Medical Center Campus entry points as suggested by Metro, would be designed in accordance with County standards under the review of County staff. Further, if any of the locations noted in this comment are not controlled by existing or proposed signals, or are at locations where an existing signal would be removed, the frequency of signals in this area would reduce the need for mid-block crossings.

Response 3-6

This comment summarizes the State-mandated analysis requirements regarding the Congestion Management Program (CMP) and consultation with Caltrans. As discussed on pages 4.L-67 and 4.L-68 in Section 4.L of the Draft EIR, the Master Plan Project would not meet the minimum peak hour trip numbers at CMP arterial stations or freeway monitoring stations to require further analysis and, therefore, would not result in a change in the V/C ratio of 0.02 or greater. Accordingly, impacts to regional CMP transportation systems were determined in the Draft EIR to be less than significant. In addition, as suggested by the comment, the Draft EIR evaluated impacts to both CMP facilities (as noted above) and public transit services and facilities, as discussed on pages 4.L-79 and 4.L-80 of the Draft EIR. Therefore, the Draft EIR and the Project Traffic Study (included as Appendix I of the Draft EIR) adequately addressed impacts to CMP facilities and transit services. Caltrans has been consulted as well in the review process.

Response 3-7

Thank you for providing a contact for any follow-up questions. Metro indicates that it looks forward to seeing the Final EIR. As a responding public agency, Metro will receive a copy of responses to its comments in compliance with CEQA as well as instructions on accessing the Final EIR.



LETTER 4

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

John Wicker, Director

Norma E. Garcia, Chief Deputy Director

September 26, 2016

Sent via e-mail: cnash@dpw.lacounty.gov

TO: Ms. Clarice Nash
Project Management Division
Department of Public Works

FROM: Kathline J. King, AICP *K King*
Chief of Planning

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
HARBOR/UCLA MEDICAL CENTER MASTER PLAN**

The proposed Draft EIR for the Harbor/UCLA Medical Center Master Plan has been reviewed for potential impacts on the facilities of the Department of Parks and Recreation (DPR). Please find our comments below:

Page No.	Edits/Comments/Questions
4.K.3-1	<ul style="list-style-type: none"> DPR does not operate County beaches. The Los Angeles County Department of Beaches and Harbors is responsible for the operation and maintenance of County Beaches. The source for the Countywide average of 3.3 acres of local parkland per 1,000 residents should be the Los Angeles Countywide Parks and Recreation Needs Assessment. The Parks Needs Assessment Final Report is available at this link: http://lacountyparkneeds.org/wp-content/uploads/2016/06/FinalReport.pdf
4.K.3-2	<ul style="list-style-type: none"> It should be clarified that Park Learning Grove County Park is only open two hours a day during the week, from 2:30 to 4:30 pm (Monday through Friday). The park is closed on Saturdays, Sundays, and holidays. This arrangement is based on a Community Recreation Agreement with the Los Angeles Unified School District (LAUSD) for Meyler Street School. The "new County neighborhood park" referenced on this page is not under construction yet. It is in the environmental review stage, i.e. an Initial Study/Mitigated Negative Declaration is being prepared for the project. Also, we want to clarify that the Los Angeles Neighborhood Land Trust (LANLT), a non-profit organization, will be developing the park. DPR will contribute Quimby (park) funds to assist in the development of this park, pending the approval of a park funding agreement. The park is anticipated to open in September 2018, and will be operated and maintained by DPR, pending the approval of a lease agreement by the Los Angeles County Board of Supervisors.

4.K.3-6	<ul style="list-style-type: none"> Edit: "Pending <u>approval of a lease agreements with the Del Amo Neighborhood Park LLC by the Los Angeles County Board of Supervisors.</u>" 	4
4.K.3-9	<ul style="list-style-type: none"> The parcel tax measure that will be on the November 2016 ballot should be referred to as "Measure A" (see http://file.lacounty.gov/SDSInter/dpr/249055_MeasureA-InformationSheet.pdf). Please add a paragraph description for the Los Angeles Countywide Parks and Recreation Needs Assessment (http://lacountyparkneeds.org/final-report/) which was adopted by the Board of Supervisors on July 5, 2016. 	5
4.K.3-13	<ul style="list-style-type: none"> Please clarify that the new neighborhood park is anticipated to open in September 2018, and will be operated and maintained by DPR, pending the approval of a lease agreement by the Los Angeles County Board of Supervisors. 	6
General Comment	<ul style="list-style-type: none"> Given the lack of parkland in West Carson and limited availability of vacant land for new park development, would Harbor-UCLA Medical Center be interested in working with DPR to develop a project like the Martin Luther King, Jr. Fitness Garden (http://parks.lacounty.gov/wps/portal/dpr/Parks/Martin_Luther_King_Jr_Fitness_Park)? This garden complements the Martin Luther King, Jr. Center for Public Health building in Willowbrook, and offers a walking path and par course fitness equipment surrounded by beautiful flowers and shrubs. Please contact DPR if you would like to discuss this idea further. 	7

Thank you for including this Department in the review of this project. If you have any questions, please contact Clement Lau of my staff at clau@parks.lacounty.gov or (213) 351-5117.

c: Parks and Recreation (C. Lau, J. Yom)

LETTER 4

County of Los Angeles Department of Parks and Recreation
Kathline J. King, AICP
Chief of Planning
Planning and Development Agency
510 South Vermont Avenue
Los Angeles, CA 90020-1975
(September 26, 2016)

Response 4-1

This comment provides an introduction to the comments contained in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 4-2 through 4-7.

Response 4-2

The document will be revised to reflect your comments that the Department of Parks and Recreation does not operate County beaches, and correcting the reference for the Countywide parkland-to-resident ratio on page 4.K.3-1 in Section 4.K.3, Parks and Recreation, of the Draft EIR . as shown in Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR.

Response 4-3

The clarifications regarding the Park Learning Grove County Park's operating hours and, the comments regarding the construction and operation of the "new County neighborhood park" referenced on page 4.K.3-2 in Section 4.K.3 of the Draft EIR have been reviewed. These clarifications do not affect the analysis or conclusions presented in the Draft EIR regarding Project-related impacts to park and recreational facilities in the Project area.

Response 4-4

This comment provides clarifying edits for text on page 4.K.3-6 in Section 4.K.3 of the Draft EIR. The suggested edits have been made as shown in Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR.

Response 4-5

This comment requests that additional information regarding Measure A, a parcel tax that will be on the November 2016 ballot, and the Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment, which was adopted by the Board of Supervisors on July 5, 2016, be provided for context on page 4.K.3-9 in Section 4.K.3 of the Draft EIR. The suggested edits have been made as shown in Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR.

Response 4-6

This comment suggests that clarifying language be added to page 4.K.3-13 in Section 4.K.3 to state that the new neighborhood park is anticipated to open in September 2018, and will be operated and maintained by

DPR, pending the approval of a lease agreement by the Los Angeles County Board of Supervisors. The suggested edits have been made as shown in Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR.

Response 4-7

This comment suggests that given the lack of parkland in West Carson and limited availability of vacant Comment land for new park development, the County Department of Public Works should consider working with DPR to develop a park facility similar to the existing Martin Luther King, Jr. Fitness Garden. While the ultimate provision of such a facility within the Medical Center Campus may not be precluded by future development under the Master Plan Project, implementation of such improvements has no effect on the analysis and conclusions regarding Project-related impacts to parks and recreational facilities presented in the Draft EIR.

Response 4-8

This comment provides a conclusion to the comments contained in this letter. Responses to the comments contained in this letter are provided above in Responses to Comments 4-2 through 4-7.

LETTER 5

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294



DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

September 12, 2016

Clarice Nash, Project Manager
Los Angeles County Department of Public Works
Project Management Division I
900 S. Fremont Avenue
Alhambra, CA 91803

Dear Ms. Nash:

NOTICE OF AVAILABILITY AND PUBLIC MEETING, DRAFT ENVIRONMENTAL IMPACT REPORT, "HARBOR-UCLA MEDICAL CENTER CAMPUS MASTER PLAN PROJECT," TO CONSIDER CURRENT CONDITIONS AND FUTURE NEEDS OF THE MEDICAL CENTER HOSPITAL AND CLINICS, 1000 WEST CARSON STREET, TORRANCE, FFER 201600140

The Notice of Availability and Public Meeting has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

1. In Table ES 1: Summary of Project Impacts, Project Design Features, and Mitigation Measures, 4.K.1 Fire Protection and Emergency Services, Mitigation Measure MM Fire-2 should be deleted. The Developer Fee Program is only in effect in urban expansion areas of the County and therefore would not apply to the proposed project or surrounding area.

All other references within the document to Mitigation Measure FIRE-2 should

1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLEN DORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

Clarice Nash, Project Manager
September 12, 2016
Page 2

likewise be deleted.

LAND DEVELOPMENT UNIT:

The Land Development Unit does not have any additional information at this time. Land Development Unit comments are addressed in the document, and in the "appendix." If you have any questions regarding the report, please contact FPEA Wally Collins at (323) 890-4243 or at Wally.Collins@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

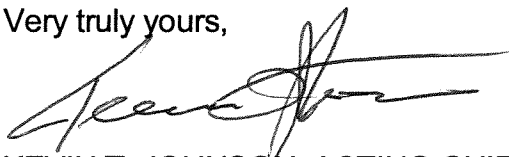
The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comment regarding the project at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:cc

1
CONT

2

3

4

LETTER 5

County of Los Angeles Fire Department
Kevin T. Johnson
Acting Chief, Forestry Division
Prevention Services Bureau
1320 North Eastern Avenue
Los Angeles, CA 90063-3294
(September 12, 2016)

Response 5-1

This comment is an introduction to the comment provided by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. Responses to these comments are provided below in this Response and Responses to Comments 6-2 through 6-4.

This comment also recommends deleting Mitigation Measure FIRE-2 regarding the Developer Fee Program because it would not apply to the Project location. This revision has been incorporated into Chapter 3.0, Revisions, Clarifications and Corrections to the Draft EIR, in this Final EIR.

Response 5-2

This comment confirms that the Land Development Unit has no additional information and comments regarding the Draft EIR at this time.

Response 5-3

The Forestry Division outlines its statutory responsibilities and requests that any environmental impacts be addressed in the areas of erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. The EIR addresses these areas. Erosion control is addressed in Section 4.G, Hydrology and Water Quality, of the Draft EIR. Compliance with the Construction General Permit, Stormwater Pollution Prevention Plan (SWPPP), and National Pollutant Discharge Elimination System (NPDES) requirements that require construction phase Best Management Practices (BMPs) are considered protective of water quality during construction and would, therefore, prevent a substantial violation of water quality standards and minimize the potential for contributing additional sources of polluted runoff during construction of the Project. These existing regulations, programs, and policies would ensure that water- and wind-related erosion would be confined to the construction area and not transported off-site. Standard construction phase BMPs required for compliance with NPDES requirements would decrease the potential for any significant erosion or sedimentation from soil disturbance associated with construction. Any potential impacts on water quality arising from erosion and sedimentation are expected to be localized and temporary (i.e. during construction). NPDES compliance would require contractors to implement measures to minimize and contain erosion and sedimentation and be required to submit a grading plan to the County for approval prior to the commencement of any construction activities. During construction, the Project would be required to adhere to the NPDES Construction General Permit to control erosion and protect water quality. Project buildout would not substantially alter the existing drainage

patterns on the Harbor-UCLA Campus, Project area, or receiving waters, or result in substantial erosion or siltation on- or off-site; therefore, there will be no significant operational impacts regarding erosion.

Watershed management is addressed in Section 4.G, Hydrology and Water Quality, of the Draft EIR. As required by the California Water Code, the Los Angeles Regional Water Quality Control Board (LARWQCB) has adopted the “Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties” (LA Basin Plan). Specifically, the LA Basin Plan designates beneficial uses for surface water and groundwater, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's Antidegradation policy, and describes implementation programs to protect all waters in the Los Angeles region. In addition, the LA Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. In addition to the LA Basin Plan, the Project would integrate Low-Impact Development (LID) to conserve watershed resources, reduce impacts of development, and use innovative management practices to meet the stormwater objectives. LID would be implemented along with watershed planning to provide comprehensive watershed management for the Project.

Rare and endangered species, as well as vegetation, are addressed in Section IV, Biological Resources, of the Initial Study Attachment B, Explanation of Checklist Determinations, provided in Attachment A of the Draft EIR. As the Medical Center Campus is located in an urbanized area surrounded by residential uses and commercial development, the Project Site does not contain any rare and endangered species. The Project Site also does not contain any habitats for sensitive natural communities as indicated in the County or in regulations by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. The Project is not located within a Significant Ecological Area (“SEA”) or coastal resource area. The Project Site does not support any candidate, sensitive, or special-status wildlife species. No locally protected biological resources, such as Wildflower Reserve Areas, SEAs, sensitive environmental resource areas (“SERAs”), or oak trees protected under the Oak Tree Ordinance (Chapter 22.56 – Part 16) in the County Code, exist on-site.

Fire zones and areas are addressed in Section 4.K.1, Fire Services, of the Draft EIR. Based on Figure 12.5 (Fire Hazard Severity Zones Policy Map) in the County's 2035 General Plan Update Safety Element, the Project Site is not located within a designated Wildland Fire Hazard Area. Therefore, the Project Site is not subject to wildland fires and has no need for fuel modification measures.

Archaeological and cultural resources are addressed in Section V, Cultural Resources, of the Initial Study Attachment B, Explanation of Checklist Determinations, provided in Attachment A of the Draft EIR. The Medical Campus is located within a highly urbanized area and has been subject to physical disruption over the course of several decades since it was first developed in 1943. For this reason, it is likely that any resources that may have been present on the property have been disturbed or removed. Nonetheless, previously undiscovered buried archaeological resources could still exist on the property. Implementation of the Project would require grading, excavation, and trenching into native soils, which could result in direct impacts to undiscovered resources. Mitigation Measures CULT-1, CULT-2, and CULT-3 are therefore recommended to ensure that impacts on any previously unknown archaeological resources discovered during Project construction would remain less than significant. Operations during and following Project buildout would have no impact on archaeological resources. A comprehensive Historic Resource Report was prepared by GPA Consulting for the entire Medical Campus and is included as Appendix A of the Initial Study. The Medical Campus has not been evaluated or identified as significant in any previous historic resource

surveys, nor is it currently designated a landmark at the national, state, or local levels. The property is lacking in integrity – the ability to convey its significance – because there are not enough buildings remaining from the period of significance; the remaining buildings have been altered to the point that they no longer contribute to an historic district; and enough new buildings have been added that the property no longer represents an intact historic environment. With respect to the individual eligibility of buildings, while some buildings retain integrity from the period of significance, they do not effectively convey the history or significance of the Station Hospital on their own. As such, the property is not eligible for listing in the National Register or the California Register as a historic district, and none of the buildings are individually eligible for listing in the National Register or the California Register.

Response 5-4

This comment confirms that the Health Hazardous Materials Division has no additional comments regarding the Draft EIR. This comment also provides a general conclusion to the comments provided in this letter. Responses to these comments are provided above in this Response and Responses to Comments 6-1 through 6-3.

LETTER 6



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

September 30, 2016

Ref. Doc. No.: 3846822

Ms. Clarice Nash, Project Manager
County of Los Angeles
Department of Public Works
Project Management Division I
900 South Fremont Avenue
Alhambra, CA 91803-1331

Dear Ms. Nash:

Response to the DEIR for the Harbor-UCLA Medical Center Campus Master Plan Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on August 17, 2016. The proposed project is located within the jurisdictional boundaries of District No. 8. We offer the following comments:

4. ENVIRONMENTAL IMPACT ANALYSIS M. UTILITIES 1. WATER SUPPLY

- 1. c. Project Characteristics or Design Features, page 4.M.1-38, paragraph under the subtitle – The paragraph details the total facilities area planned for year 2030 as 2,457,355 square feet, increasing building space by a net total of 1,178,071 square feet. After the proposed demolition of 759,649 square feet, new construction would be a total 1,937,720 square feet.

4. ENVIRONMENTAL IMPACT ANALYSIS M. UTILITIES 2. WASTEWATER

- 1. (3) Wastewater Conveyance Facilities, page 4.M.2-2, paragraph under the subtitle – A series of trunk sewers are identified in the information. The following is a list of the Districts' trunk sewers within that information and their respective service availability.

Table with 5 columns: Name, Location, Size (dia.), Trunk Sewer Availability. Rows include JOA-1A District 5 Interceptor Relief Trunk Sewer, JOA-1A District 5 Interceptor Trunk Sewer, Joint Outfall D Unit 8 Trunk Sewer, Joint Outfall D Unit 1D Trunk Sewer, Joint Outfall D Unit 1D Replacement Trunk Sewer, and Joint Outfall D Unit 1D Trunk Sewer.

*diameter in inches
**diameter of trunk sewer liner

To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at engineeringcounter@lacsds.org or call (562) 908-4288, extension 1205. The eight-inch sewer described in the paragraph is maintained by Department of Public Works Consolidated Sewer and Maintenance District.

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CONT

2. (3) Wastewater Conveyance Facilities, *page 4.M.2-2*, first paragraph top of page – Direct connections to a Districts' trunk sewer will require submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at (562) 908-4288, extension 1205.

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3. c. Project Characteristics, *page 4.M.2-7*, first paragraph – A New Hospital Tower and other ancillary buildings related to the tower are described as part of the proposed project. The proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.

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4. Table 4.M.2-2, *page 4.M.2-4*, Wastewater Generation During Operations –The expected increase in average wastewater flow derived from the proposed project breakdown described in the table is 176,565 gallons per day, after all structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsds.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.

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5. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: M. Sullivan
M. Tatalovich

LETTER 6

County Sanitation Districts of Los Angeles County
Adriana Raza, Customer Service Specialist
Facilities Planning Department
1955 Workman Mill Road
Whittier, CA 90601-1400
(September 30, 2016)

Response 6-1

This comment acknowledges receipt of the Draft EIR on August 17, 2016. This comment also provides an introduction to the comments contained in this letter. Responses to the comments contained in this letter are provided below in Responses to Comments 6-2 through 6-6.

Response 6-2

This comment provides a summary of information provided in Chapter 2.0, Project Description, of the Draft EIR with respect to the Project increase in building space.

Response 6-3

This comment provides the name, location, size and availability status of various County Sanitation Districts-owned and operated sewer facilities in the Project area, which expands upon the facilities discussed on page 4.M.2-2 in Section 4.M.2, Wastewater, of the Draft EIR and provides the contact information for obtaining as-built drawings of District facilities. The comment also clarifies that the referenced eight inch sewer described in the EIR is maintained by the County Consolidated Sewer and Maintenance District. Although this comment provides additional information regarding sewer facilities in the area, it does not warrant any changes to the analysis or conclusions presented in the Draft EIR regarding Project-related wastewater system analysis which concluded there are no capacity issues for the proposed Project.

Response 6-4

This comment states that future connections to a Districts' trunk sewer will require submittal of Sewer Plans for review and approval by the Districts. It is acknowledged that once detailed building plans for future improvements on the Medical Center Campus are prepared, associated sewer plans would be provided to the Districts for review and approval prior to issuance of sewer connections permits.

Response 6-5

This comment indicates that the various new buildings proposed for development on the Medical Center Campus may require an amendment to a Districts' permit for Industrial Wastewater Discharge and provides follow-up contact information. The Districts suggest that project managers for the Master Plan Project should contact the Districts' Industrial Waste Section in order to reach a determination regarding the need to amend an Industrial Waste Permit. If this update is necessary, copies of final plans and supporting information for the proposed improvements approvals will be required before beginning Project construction. The Project would comply with this requirement, as applicable.

Response 6-6

As acknowledged in this comment, the projected increase in wastewater generation resulting from Project implementation is based on generation factors provided in Table 1, Loadings for Each Class of Land Use, projected wastewater increases are consistent with the generation factors prescribed by the Districts for estimating future wastewater flows from future development.

Response 6-7

Thank you for your comment which acknowledges that, as clarified, all other information in the EIR concerning Districts' facilities is current, and for providing contact information.

LETTER 7

Clarice Nash

From: Zak gonzalez II <zakgII@hotmail.com>
Sent: Monday, October 03, 2016 4:39 PM
To: Clarice Nash
Cc: John Lodge; Zak Gonzalez II
Subject: Fw: Draft EIR Harbor-UCLA Medical Center, 1000 W. Carson Street

From: Zak gonzalez II
Sent: Monday, October 3, 2016 4:36 PM
To: cnash@dpw.lacounty
Cc: jlodge@dpw.lacounty.gov; zgonzale@carson.ca.us
Subject: Draft EIR Harbor-UCLA Medical Center, 1000 W. Carson Street

October 3, 2016

Ms. Clarice Nash, Project Manager

Re: City of Carson, Planning Division comments on Draft EIR for the Harbor-UCLA Medical Center Campus Master Plan Project

The Carson Planning Division provides the following comments:

- The Harbor-UCLA Medical Center (Campus) improvements would add approximately 1,178,071-square-feet to an existing 1,279,284-square-foot medical facility; 1
- Campus improvements would increase facility parking from 3,186 spaces to 4,240 spaces;
- Campus employees would increase from 5,464 to 7,494 employees;
- The Draft EIR has identified potential significant adverse impacts to the Caltrans I-110 facility due to expected increases in traffic trips resulting from Campus improvements and has offered a "fair-share" contribution to Caltrans to offset increases in trips; 2
- However, the Draft EIR has not identified the same significant adverse impacts to Carson Street within the City of Carson due to the same expected increases in traffic trips. Furthermore, the Draft EIR has made no reference to a "fair-share" contribution to the City of Carson for potential significant adverse impacts on Carson Street due to expected increases in traffic trips resulting from the culminating completion of the Campus facility additions by 2030; 3
- The Harbor-UCLA Medical Center Campus is currently impacted by a large population of "homeless people/families" that live in front and immediately around the existing Campus facility. However the Draft EIR made no reference to how coordination of "homeless assistance programs" will be implemented with State and County resources to decrease the existing and potential increased homeless population that will be attracted to the new Campus improvements. 4

Thanks for the opportunity to comment on the Draft EIR for the Harbor-UCLA Medical Center Campus project. 5

Sincerely,
Zak Gonzalez II, Associate Planner
701 E. Carson Street, Carson, California, 90745
(310) 952-1700 ext. 1301/ (559) 475-4657 (cell-phone)

LETTER 7

City of Carson
Zak Gonzalez II, Associate Planner
701 E. Carson Street
Carson, CA 90745
(October 3, 2016)

Response 7-1

This comment summarizes data on Project expansion based on the EIR Section 2.0 Project Description. Responses to the comments contained in this letter are provided below in Responses to Comments 7-2 and 7-3.

Response 7-2

This comment summarizes the Draft EIR's findings regarding impacts to the I-110 ramps at Carson Street, which were determined to be significant and unavoidable due to the fact that recommended improvements prescribed by Mitigation Measure TRAF-1, are under the control of Caltrans and thus their implementation cannot be guaranteed.

Response 7-3

This comment states that the Draft EIR did not identify the same significant traffic impacts to Carson Street east of the I-110 Freeway in the City of Carson, and also does not provide any fair-share payments for such impacts. As discussed in Section 4.L, Transportation and Traffic, of the Draft EIR, the Traffic Study, included as Appendix I of the Draft EIR, did not identify significant traffic impacts in the City of Carson along Carson Street. Project-related traffic did not trigger significant delays at any intersections in the City of Carson, including those along Carson Street. Because the Project would not result in potentially significant traffic impacts in the City of Carson, no fair-share contributions or other mitigation measures are necessary or proposed.

Response 7-4

The commenter indicate that the Draft EIR did not address how homeless families currently in front of or around the existing campus will be assisted by State and County resources to decrease this population that will be attracted to the new campus improvements. Purely social effects of a project are beyond the scope of analysis under the California Environmental Quality Act, which focuses on the impacts of the Project on the physical environment. Nonetheless, this comment will be transmitted to the Board of Supervisors prior to their consideration of the Project approval. Independent of the EIR, the County of Los Angeles continues to address improving services to the homeless.

Response 7-5

This comment expresses appreciation for the opportunity to comment on the Project.

LETTER 8

Clarice Nash

From: Linda Ko <lindako412@gmail.com>
Sent: Sunday, September 11, 2016 4:28 PM
To: Clarice Nash
Subject: neighbor of Harbor-UCLA Medical Center

Dear Clarice Nash,

Thank you for the notice of the Harbor-UCLA Medical Center Campus Master Plan Project. I could not find information regarding the hazards/hazardous materials to be used on the website provided.

Will these materials be exposed to neighbors living within a certain vicinity of the Harbor-UCLA Medical Center Campus? If so, what are the potential consequences?

Thank you for your time.

Best,
Linda Ko

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LETTER 8

Linda Ko
(September 11, 2016)

Response 8-1

This comment requests information regarding hazards/hazardous materials to be used. Hazards/hazardous materials are discussed in Section 4.F, Hazards and Hazardous Materials, of the Draft EIR. As stated therein, small quantities of hazardous substances are currently used on the portion of the Project Site occupied by the Harbor-UCLA Medical Center. These substances include common hospital materials (e.g. rubbing alcohol, carbon dioxide cylinders, needles), central plant secondary containment necessities (e.g. anti-foam, bleach, pressure oil), and other cleaning agents (e.g. bleach, clout drums, phosphoric acid drums). Construction also would involve the short-term use and disposal of hazardous substances such as paint, adhesives, surface coatings, finishing materials, and cleaning agents during building finishing activities. The use and disposal of such materials would take place in accordance with applicable federal, state, and local regulations governing health and safety and such activities are not anticipated to create a significant hazard to the public or environment. Project operations would involve the use and storage of limited quantities of hazardous materials such as cleaning solvents, painting supplies, and pesticides used for landscaping. Additionally, waste generated by general hospital operations typically includes regulated medical waste, “sharps” containers, pharmaceutical waste, chemo waste, and pathological waste, and the nature of future hospital operations on the Campus will not significantly differ from existing daily operations. Furthermore, future expanded LA BioMed operations and operation of the proposed Biotech Science Campus on the Harbor-UCLA Campus would involve the use of limited quantities of potentially hazardous materials typical of those used in biomedical research facilities.

All potentially hazardous materials and waste handled on the Harbor-UCLA Campus would be used, stored, and disposed of in accordance with manufacturer instructions and in a regulatory setting with applicable federal, state, and local health and safety regulations which are discussed in the Draft EIR on pages 4.F-10 through 4.F-13 in Section 4.F, Hazards and Hazardous Materials With implementation of Mitigation Measure HAZ-1 and HAZ-2, construction activities regarding hazards and hazardous materials will be less than significant.

Neighbors living within a certain vicinity of the Harbor-UCLA Medical Center Campus will not be exposed to hazards and hazardous materials as a result of Project implementation.

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