



MARK PESTRELLA, Director

**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
REFER TO FILE

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

29 November 12, 2019

CELIA ZAVALA
EXECUTIVE OFFICER

November 12, 2019

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

**CONSTRUCTION CONTRACT
PUBLIC BUILDING CORE SERVICES AREA
RANCHO LOS AMIGOS NATIONAL REHABILITATION CENTER
RESTORATIVE CARE VILLAGE PROJECTS
APPROVE PROJECTS AND APPROPRIATION ADJUSTMENT
AWARD DESIGN-BUILD CONTRACT AND CONSULTANT SERVICES AGREEMENT
SPECS. 7553; CAPITAL PROJECT NO. 69871
SPECS. 7597; CAPITAL PROJECT NO. 87465
(SUPERVISORIAL DISTRICT 4)
(4 VOTES)**

SUBJECT

Public Works is seeking Board approval to certify the Addendum to the previously certify Environmental Impact Report for the Rancho Los Amigos National Rehabilitation Center project; approve the Rancho Los Amigos National Rehabilitation Center Recuperative Care Center and Residential Treatment Program projects; approve project budgets; award a design-build contract; authorize a consultant services agreement; and approval of an appropriation adjustment.

IT IS RECOMMENDED THAT THE BOARD:

1. Certify that Addendum No. 3 to the previously certified Final Environmental Impact Report for the Rancho Los Amigos National Rehabilitation Center project, as modified in the previously certified Addendum Nos. 1 and 2, has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the County; find that the Board has reviewed and considered the information contained in Addendum No. 3 and Final Environmental Impact Report, as modified in the previous Addendum Nos. 1 and 2, prior to approving the proposed

refinements to the Rancho Los Amigos National Rehabilitation Center project.

2. Approve the project budget for the Recuperative Care Center, Capital Project No. 87465, with a project budget of \$20,154,000.

3. Approve the project for the Residential Treatment Programs project, Capital Project No. 69871, with a project budget of \$44,973,000.

4. Approve an appropriation adjustment for a combined total of \$23,219,000 to fund the Fiscal Year 2019-20 project expenditures for two Capital Projects as follows: \$5,660,000 for the Recuperative Care Center, Capital Project No. 87465 and \$17,559,000 for the Residential Treatment Programs, Capital Project No. 69871.

5. Find that Kemp Bros. Construction, Inc., is the responsive and responsible proposer that submitted the best value proposal for design and construction of the Residential Treatment Program and Recuperative Care Center projects at the Rancho Los Amigos National Rehabilitation Center.

6. Award and authorize the Director of Public Works or his designee to execute a design-build contract with Kemp Bros. Construction, Inc. for the design and construction of the Rancho Los Amigos National Rehabilitation Center Residential Treatment Programs Project and Recuperative Care Center projects, for a not-to-exceed amount of \$49,861,000 plus a \$2,494,000 design completion allowance for a not-to-exceed maximum contract sum of \$52,355,000.

7. Authorize the Director of Public Works or his designee, with concurrence of the Chief Executive Office, to exercise control over the \$2,494,000 design completion allowance for the two projects, including authority to reallocate the design completion allowance into the contract sum.

8. Delegate authority to the Director of Public Works or his designee to execute a consultant services agreement for a stipend amount of \$35,000 to the second highest ranked qualified proposer, enabling the County to use all design and construction ideas and concepts included in the proposal.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions will certify and approve Addendum No. 3 for the Rancho Los Amigos National Rehabilitation Center (RLANRC) project; approve the RLANRC Recuperative Care Center (RCC) and the RLANRC Residential Treatment Programs (RTP) projects; approve a total budget of \$44,973,000 for the RLANRC RTP project and \$20,154,000 for the RLANRC RCC project; award and execute a design-build (D-B) contract with Kemp Bros. Construction, Inc., authorize Public Works to exercise control of the proposed project allowances, with concurrence of the Chief Executive Office; and authorize consultant services agreements to pay stipends; and approve related appropriation adjustments.

Background

The RLANRC is located at 7601 East Imperial Highway in the City of Downey. On March 13, 2018, the Board established the RLANRC RCC project, Capital Project (C.P.) 87465, and on September 4, 2018, the Board established the capital project for the proposed RLANRC RTP, C.P. No. 69871 and RLANRC Skilled Nursing Facility (SNF), C.P. No. 87480.

Public Works has completed site investigations, scoping documents, and the D-B procurement process for the RCC and RTP projects and are ready to award the D-B. The Department of Health Services (DHS) requested that Public Works put the SNF project on hold as they survey other options across County-owned and non-owned locations to build SNF beds. The SNF project is not currently included with the RTP and RCC projects.

The proposed RCC project is programmed to be 22,000 square feet and includes a total of 50 beds and associated administrative, storage, activity, and support spaces. The RCC project offers a clinically-enriched form of interim housing and includes on-site administrative staff support, health oversight, case management, and linkage to permanent supportive housing.

The proposed RTP project includes 5 buildings with a total of 80 beds that will provide intensive treatment programs for individuals being discharged from County hospital psychiatric emergency services, inpatient units, jails, and psychiatric urgent care centers and will provide therapy and support services to patients who are rehabilitating from physical trauma.

Project Delivery Method

The proposed projects will be delivered through a D-B project delivery method. Consistent with the Board-adopted D-B policy, a stipend will be provided to the second highest ranked prequalified proposer that was not selected as the best value D-B (or top three highest ranking qualified proposers if no D-B contract is awarded) via a consultant services agreement allowing the County to use the information and ideas submitted by the proposer.

Upon completion of the procurement process for the D-B, Kemp Bros. was found to have submitted the best value and most advantageous proposal. However, cost proposals were higher than the original budgeted constructing amount due to unusual cost escalations being experienced in a high demand construction market. Value engineering efforts such as changing the method of construction from modular construction to site-build construction were reviewed with Kemp Bros. to reduce and finalize their cost proposal, without compromising the building quality and patient care services. After extensive negotiation to reduce the cost proposal, Public Works negotiated the final maximum contract sum amount at \$52,355,000.

It is anticipated that the construction of the proposed projects will begin in June 2020 and be substantial completed in the summer of 2021.

Design Completion Allowance

The maximum contract sum of \$52,355,000 includes a \$2,494,000 design completion allowance that is intended to facilitate the resolution of issues identified during the design phase. The design completion allowance is reserved for changes requires by jurisdictional agencies and other unanticipated design issues. The inclusion of the design completion allowance will facilitate the design decision process and minimize potential delays that could occur with design issues.

Consultant Services Agreement

Upon the Board's approval, the second highest ranked, qualifying D-B proposer for the RLANRC RCC and RTP projects will be paid a stipend of \$35,000 pursuant to consultant services agreement, which affords the County the right to uses the information and ideas submitted by the proposer.

Green Building/Sustainable Design Program

On December 20, 2016, the Board adopted a new Leadership in Energy and Environmental Design (LEED) policy. The RCC project is designed to achieve the United States Green Building Council LEED Gold level certification by incorporating sustainable design feature to optimize energy and water use efficiency, enhance the sustainability of the site, improve indoor environmental quality, and maximize the use and reuse of sustainable and local resources.

The proposed RTP is exempt from the Board-adopted LEED policy since they are all under 10,000 square feet.

Implementation of Strategic Plan Goals

The County Strategic Plan directs the provision of Strategy II.1, Drive Economic and Workforce Development in the County, Strategy II.2, Support the Wellness of our Communities, and Strategy III.3, Pursue Operational Effectiveness, Fiscal Responsibility, and Accountability. The recommend actions support the Strategic Plan by supporting the wellness of our communities and enhancing the delivery of behavioral healthcare services that will in turn benefit the common good by driving the development of the workforce and the economic development of the County.

FISCAL IMPACT/FINANCING

The project budgets (Enclosure A) for the proposed RLANRC RCC and RTP are \$20,154,000 and \$44,973,000, respectively. The project budgets include construction, change order contingency, plans and specifications, permit fees, consultant services, inspection services, and County services.

The RLANRC RTP is funded by the Department of Mental Health (DMH) State 2011 Realignment revenue in the amount of \$34,973,000 and SB 82 Grant from California Health Facilities Financing Authority in the amount of \$10,000,000, for a total of \$44,973,000.

The enclosed Fiscal Year (FY) 2019-20 Appropriation Adjustment will reallocate \$5,660,000 from the DHS Obligated Enterprise Fund Balance – Committed for the DHS to fund the projected FY 2019-20 expenditures for the RLANRC RCC. DHS will request future year's funding as necessary in future budget phases, funded by DHS' Obligated Enterprise Fund Balance. DHS will also work with the Chief Executive Office to evaluate additional funding options that could be utilized in future fiscal years in lieu of DHS Obligated Enterprise Fund Balance. DMH will provide \$17,559,000 to fund the project expenditures for FY 2019-20 and request future year's funding in a future project process.

Approval of the enclosed Appropriation Adjustment (Enclosure B) will provide sufficient appropriation in FY 2019-20 Capital Projects budget to fund the FY 2019-20 project expenditures for the RCC and the RTP projects.

Operating Budget Impact

RCC Project

Future fiscal years' operating costs will be quantified and requested through the annual budget request process by DHS.

RTP Project

Following completion for the project, DMH anticipates one-time cost estimated at \$2,500,000 for the project, fully funded by State Mental Health Services Act revenue.

DMH also anticipates ongoing annual operation costs estimated \$15,000,000 for the RLANRC RTP. The ongoing costs for this program will be funded by State and Federal revenues.

Funding for operating costs will be requested through DMH's annual budget request process. There is no net County cost impact associated with the recommended actions.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

In accordance with the Board's Civic Arts Policy, the RTP and RCC project budgets includes a budget of \$504,000 to be allocated to the Civic Arts Special Fund that is 1 percent of the design and construction costs.

In accordance with the Board's consolidated Local and Targeted Worker Hire Policy adopted on September 6, 2016, the RTP and RCC projects will require that at least 30 percent of the total California craft worker hours for construction of the project be performed by Local Resident and at least ten percent performed by Targeted Workers facing employment barriers.

The D-B contract with Kemp Bros. will contain terms and conditions supporting the Board's ordinance and policies, including but not limited to: Child Support Compliance Program; Contractor Responsibility and Debarment; Contractor Employee Jury Service Program; Defaulted Property Tax Reduction Program; County's Greater Avenues for Independence and General Relief Opportunities for Work Policies; Reporting of Improper Solicitations; Contract Language to Assist in Placement of Displaced County Workers; and Notice to Contract Employees of Newborn Abandonment Law (Safely Surrendered Baby Law).

ENVIRONMENTAL DOCUMENTATION

The Environmental Impact Report (EIR) for the original approved Rancho Los Amigos Medical Center project was certified by the Board on April 7, 1992. This 1992 EIR included as part of the record a Program for Reporting and Monitoring the Implementation of Environmental Impact Mitigation Measures, a Statement of Overriding Considerations, and Findings of Fact. On February 26, 2013, the Board-certified Addendum No. 1 for a refined project, which reduced the capacity of the approved project, included additional demolition and limited new construction to consolidate facilities. Approval of the refined project in 2013 analyzed in the previously certified Addendum No. 1 which resulted in fewer licensed hospital beds in the remaining hospital.

On July 29, 2014, the Board-certified Addendum No. 2 for a refined project, which included the addition of a new stand-alone RLANRC warehouse, an accessible gymnasium, wellness, and aquatic therapy center, and temporary use of modular buildings during construction to facilitate continuity of hospital services at the campus during implementation.

Further revisions to the previously approved project were subsequently proposed for the 2019 RLANRC refined project which were described and analyzed in Addendum No. 3, including the removal of 200 veteran housing units (175,365 square feet) that was included in Addendum No. 1,

and the addition of three new components totaling up to 180,000 square feet including: an 85,000-square-foot Skilled Nursing Facility with up to 150 beds; 55,000 square feet RTP consisting of five modules of 11,000 square feet each and a total of 80 beds; and 40,000 square feet RCC with up to 50 beds.

Addendum No. 3 (Enclosure C) to the previously certified EIR, as amended by the previously certified Addendum Nos. 1 and 2, was prepared for the proposed RLANRC project refinements since some changes or additions to the EIR and previous Addenda were required as a result of the refinements to the previously approved project; however, none of the conditions described in State California Environmental Quality Act (CEQA) Guidelines Section 15162 which would require the preparation of a subsequent EIR have occurred. There are no changes to the project or to the circumstances under which the project is undertaken that require further review under CEQA.

Addendum No. 3 analyzes potential environmental effects associated with proposed changes in the project scope and includes justification that environmental impacts resulting from the currently proposed refinements to the RLANRC project would not result in any new significant impacts beyond those previously identified in the EIR. The previously adopted Program for Reporting and Monitoring the Implementation of Environmental Impact Mitigation Measures as well as the Finding of Facts and Statement of Overriding Considerations will continue to apply to the refined RLANRC project, including as applicable, to the project refinements. The required fee, if any, to the California Department of Fish and Wildlife was paid for the previously certified EIR.

The location of the documents and other materials constituting the record upon which the Board's decision is based in this matter is Public Works, Project Management Division I, 900 South Fremont Avenue, Alhambra, CA 91803. The custodian of documents and materials is Ms. Alicia Ramos, Public Works, Project Management Division I, 900 South Fremont Avenue, Alhambra, CA 91803. The documents can also be found using the following link:
<ftp://dpwftp.co.la.ca.us/pub/pmd/RanchoEIR>.

Upon the Board's approval of the refinements to the RLANRC project, Public Works will file a Notice of Determination with the Registrar-Recorder/County Clerk in accordance with Section 21152 of the California Public Resources Code.

CONTRACTING PROCESS

The D-B procurement was conducted in accordance with the D-B policy adopted by the Board on June 4, 2016.

On February 7, 2019, Public Works issued an RFP for design-build services. The first phase of the RFP process was the submittal of a prequalification questionnaire (Part A) by all interested D-B firms. On March 21, 2019, three prequalification questionnaires were received for evaluation. The prequalification questionnaires were reviewed by an evaluation committee made up of members from the DHS, DMH, CEO, and Public Works. Based on the review and evaluation of the prequalification questionnaires, three firms were determined to be qualified. In accordance with the shortlisting requirements in the RFP, the top three firms were shortlisted and invited to submit technical and cost proposals (Part B) for the project.

On August 1, 2019, two of the top three shortlisted D-B firms submitted technical and cost proposals for evaluation. The technical and cost proposals were evaluated by the evaluation committee

members based on technical design and construction expertise, proposed delivery plans, schedule, price, life cycle costs, workforce commitment, local and targeted worker hiring programs, design excellence, and design-build team personnel and organization. Both technical proposals met the intent, program, and base scope of work as defined in the final scoping documents. Kemp Bros. in its D-B proposal was found to have submitted the best value and most advantageous proposal to perform these services under the D-B delivery method, in accordance with the evaluation criteria stated in the RFP. These evaluations were completed without regard to race, creed, color, or gender.

Kemp Bros.' Community Business Enterprises participation data and three-year contracting history with the County are on file with Public Works.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There will be no impact on current County services or projects during the performance of the recommended actions.

CONCLUSION

Please return one adopted copy of this Board letter to Public Works, Project Management Division I.

Respectfully submitted,



MARK PESTRELLA

Director

MP:ME:jc

Enclosures

c: Department of Arts and Culture
Auditor-Controller
Chief Executive Office (Capital Programs
Division)
County Counsel
Executive Office
Department of Health Services
Department of Mental Health
Department of Public Social Services
(GAIN/GROW Program)

ENCLOSURE A

**CONSTRUCTION CONTRACT
PUBLIC BUILDING CORE SERVICES AREA
RANCHO LOS AMIGOS NATIONAL REHABILITATION CENTER
RESTORATIVE CARE VILLAGE PROJECTS
APPROVE PROJECT BUDGETS AND APPROPRIATION ADJUSTMENT
AWARD DESIGN-BUILD CONTRACT AND CONSULTANT SERVICES AGREEMENT
SPECS. 7553; CAPITAL PROJECT NO. 69871
SPECS. 7597; CAPITAL PROJECT NO. 87465
(SUPERVISORIAL DISTRICT 4)
(4 VOTES)**

I. PROJECT SCHEDULE SUMMARY – RCC – CP No. 87465

Project Activity	Scheduled Completion Date
Environmental Document	November 2019
Scoping Documents	June 2019
Design-Build Award	November 2019
Plan Check	By Design-Builder
Construction Start	By Design-Builder
Substantial Completion	June 2021
Project Acceptance	August 2021

II. PROJECT BUDGET SUMMARY – RCC

Project Activity	Proposed Project Budget
Hard Costs	
Construction (Design-Build)	\$ 15,131,000
Contingency	\$ 3,055,000
Construction Subtotal	\$ 18,186,000
Civic Art	\$ 154,000
Hard Costs Subtotal	\$ 18,340,000
Soft Costs	
Plans and Specifications (Scoping)	\$ 216,000
Consultant Services	\$ 139,000
Miscellaneous Expenditures	\$ 100,000
Jurisdictional Review/Plan Check/Permits	\$ 335,000
County Services	\$ 1,024,000
Soft Costs Subtotal	\$ 1,814,000
TOTAL	\$ 20,154,000

III. PROJECT SCHEDULE SUMMARY – RTP – CP No. 69871

Project Activity	Scheduled Completion Date
Environmental Document	November 2019
Scoping Documents	June 2019
Design-Build Award	November 2019
Plan Check	By Design-Builder
Construction Start	By Design-Builder
Substantial Completion	July 2021
Project Acceptance	September 2021

IV. PROJECT BUDGET SUMMARY – RTP

Project Activity	Proposed Project Budget
Hard Costs	
Construction (Design-Build)	\$ 34,730,000
Contingency	\$ 6,696,000
Construction Subtotal	\$ 41,699,000
Civic Art	\$ 350,000
Hard Costs Subtotal	\$ 42,049,000
Soft Costs	
Plans and Specifications (Scoping)	\$ 216,000
Consultant Services	\$ 300,000
Miscellaneous Expenditures	\$ 90,000
Jurisdictional Review/Plan Check/Permits	\$ 700,000
County Services	\$ 1,618,000
Soft Costs Subtotal	\$ 2,924,000
TOTAL	\$ 44,973,000

PINK

BA FORM 03/13

BOARD OF
SUPERVISORS
OFFICIAL COPY

COUNTY OF LOS ANGELES

REQUEST FOR APPROPRIATION ADJUSTMENT

DEPARTMENT OF CHIEF EXECUTIVE OFFICE

DEPT'S.
NO.

November 1, 2019

AUDITOR-CONTROLLER:

THE FOLLOWING APPROPRIATION ADJUSTMENT IS DEEMED NECESSARY BY THIS DEPARTMENT. PLEASE CONFIRM THE ACCOUNTING ENTRIES AND AVAILABLE BALANCES AND FORWARD TO THE CHIEF EXECUTIVE OFFICER FOR HIS RECOMMENDATION OR ACTION.

ADJUSTMENT REQUESTED AND REASONS THEREFOR

FY 2019-20

4 - VOTES

SOURCES

BA Detail - See Attachment Page 1.

USES

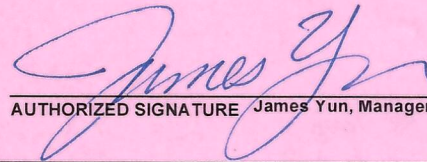
BA Detail - See Attachment Page 1.

SOURCES TOTAL: \$ 34,539,000

USES TOTAL: \$ 34,539,000

JUSTIFICATION

Reflects an increase in appropriation to the Rancho Los Amigos Residential Treatment Program with \$17,559,000 offset by State 2011-Realignment revenue by \$7,559,000 and SB 82 grant from California Health Facilities Financing Authority by \$10,000,000; also reallocate \$5,660,000 from the DHS Enterprise Fund-Committed for DHS to fund the anticipated FY 2019-20 expenditures for the Rancho Los Amigos Recuperative Care Center Project.


AUTHORIZED SIGNATURE James Yun, Manager, CEO

BOARD OF SUPERVISOR'S APPROVAL (AS REQUESTED/REVISED)

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

29 NOV 12 2019

REFERRED TO THE CHIEF
EXECUTIVE OFFICER FOR ACTION

EXECUTIVE OFFICER RECOMMENDATION

AUDITOR-CONTROLLER

BY

B.A. NO. 072

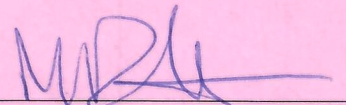
Nov. 5 20 19

☒ APPROVED AS REQUESTED

☐ APPROVED AS REVISED

CHIEF EXECUTIVE OFFICER

BY


Nov 6 20 19

CHIEF EXECUTIVE OFFICE
REQUEST FOR APPROPRIATION ADJUSTMENT
CAPITAL PROJECTS
FISCAL YEAR 2019-20

4 VOTES

SOURCES:**MENTAL HEALTH**

Rancho Los Amigos Residential Treatment Program

A01-CP-88-8918-65039-69871

2011 Realignment - Capital Projects

Increase Revenue 7,559,000

MENTAL HEALTH

Rancho Los Amigos Residential Treatment Program

A01-CP-88-8783-65039-69871

State Aid-Construction/Capital Projects 10,000,000

Increase Revenue

DHS Enterprise Fund

MN2-3078

Committed for DHS 5,660,000

Decrease Obligated Fund Balance

Rancho Los Amigos National Rehabilitation Center Enterprise Fund

MN7-HR-96-9911-60040

Operating Transfers In 5,660,000

Increase Revenue

Total Enterprise Fund \$ 11,320,000**Ent Sub - Rancho Los Amigos National Rehabilitation Center**

A01-AC-6100-21200-21230

Other Financing Uses 5,660,000

Decrease Appropriation

Total General Fund \$ 5,660,000**Total** \$ 34,539,000**USES:****MENTAL HEALTH**

Rancho Los Amigos Residential Treatment Program

A01-CP-6014-65039-69871

Capital Assets - Buildings & Improvements

Increase Appropriation 17,559,000

DHS Enterprise Fund

MN2-HS-6100-60070

Other Financing Uses 5,660,000

Increase Appropriation

Rancho Los Amigos National Rehabilitation Center Enterprise Fund

MN7-HR-96-9912-60040

Operating Subsidy - General Fund 5,660,000

Decrease Revenue

Total Enterprise Fund \$ 11,320,000**Rancho Los Amigos National Rehab Center Capital Improvements**

Rancho Los Amigos Recuperative Care Center Project

A01-CP-6014-64025-87465

Capital Assets - Buildings & Improvements 5,660,000

Increase Appropriation

Total General Fund \$ 5,660,000**Total** \$ 34,539,000

ADOPTED
 BOARD OF SUPERVISORS
 COUNTY OF LOS ANGELES

29 NOV 12 2019


 CELINA ZAVALA
 EXECUTIVE OFFICER

BA # 072

Rancho 11/5/19

3RD ADDENDUM
FINAL ENVIRONMENTAL IMPACT REPORT
RANCHO LOS AMIGOS MEDICAL CENTER NORTH CAMPUS
(SCH No. 91071053)

NORTH CAMPUS SITE CONSOLIDATION

RESTORATIVE CARE VILLAGE PROJECTS:

SKILLED NURSING FACILITY

RESIDENTIAL TREATMENT PROGRAM

RECUPERATIVE CARE CENTER

Prepared for

County of Los Angeles

Prepared by:

EFI Global

April 2019

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1. INTRODUCTION

In this Addendum references to the “project site” refer to the Rancho Los Amigos Medical Center North Campus (RLANC Project).

A. Purpose of this Addendum

The purpose of this 3rd Addendum to the Rancho Los Amigos Medical Center Final Environmental Impact Report (RLAMC FEIR) is to evaluate the environmental effects associated with the proposed further refinements (2019 RLANC Refined Project) to the project evaluated in the RLAMC FEIR and previously approved Addenda.

Original RLANC Project (redevelopment of the Rancho Los Amigos Medical Center North Campus)

The Original Project analyzed in the RLAMC FEIR included an expansion project that has been only partially constructed. Prior to implementing the Rancho Los Amigos North Campus (RLANC) Project, there was 1,014,846 square feet of hospital-related uses on the project site. The RLAMC FEIR evaluated a project that resulted in demolition of 356,000 square feet of space and a net increase of 350,183 square feet and 60 beds, for a total of 1,350,029 square feet of space and 600 beds anticipated to be on-campus on completion of the RLANC Project.

2013 RLANC Refined Project (North Campus Site Consolidation)

The 1st Addendum to the RLAMC FEIR (2013 Addendum) addressed a reduction in the size of the Original Project. The 2013 RLANC Project included renovation of 412,808 square feet (plus retention of the parking structure and safety police building), 521,000 square feet of demolition, and construction of 353,365 square feet of new buildings. The refined project analyzed in the 2013 Addendum resulted in a net reduction of 598,856 square feet of hospital related uses (not including parking), for a total of 1,162,270 square feet of hospital space and 200 beds and 200 veteran housing units. The 2013 RLANC Project resulted in consolidation of hospital beds, relocation of the outpatient building, the addition of a kitchen to the Support Services Annex and the potential construction of a 175,365 square foot, 200-unit veteran housing project. The housing would be available for veteran’s resident of California, age 62 or older (or younger if disabled), and who have honorably served on active duty in the armed forces of the United States. Vacant underutilized buildings were to be demolished.

2014 RLANC Refined Project (North Campus Site Consolidation)

The 2nd Addendum to the RLAMC FEIR (2014 Addendum) evaluated changes to the 2013 RLANC Project including construction of temporary buildings, changes to location and phasing of proposed construction and changes to phasing of demolition activities (2014 RLANC Project):

- Separation and relocation of the previously approved 12,000-square-foot warehouse (identified as part of the Outpatient Building in Addendum No. 1, moved to the northwest corner of the campus in Addendum No. 2).
- Designation of approximately 13,000 square feet for a new Accessible Gymnasium, Wellness and Aquatic Therapy Center building, immediately south of the Outpatient Building.

- Construction of up to 55,000 square feet of temporary modular buildings to support construction oversight and the provision of outpatient services on an interim basis until the occupancy permit is issued for the new Outpatient Building.
- Accelerate construction of the extension of the Jacqueline Perry Institute (JPI) into Phase I. Delay demolition of up to 361,000 square feet of the 521,000 square feet of existing structures on the North Campus to Phase II.

The second Addendum notes: “[t]here are up to four buildings on the South Campus that may be used to temporarily house employees and services that would normally be provided on the North Campus during the construction phase of the project. The use of these buildings may involve interior improvements such as cleaning and painting. These buildings are in use as a regular part of campus operations, and their potential use in conjunction with the project construction phasing is not anticipated to generate new significant environmental issue or substantially more adverse impacts than those evaluated for the approved project.”

All other components of the RLANC Project remained the same as in 2013 (total number of beds on-campus remaining at 400 as contemplated in the 2013 RLANC Refined Project).

2019 RLANC Refined Project (Restorative Care Village Projects)

The County is now proposing to further refine the project (herein referred to as 2019 RLANC Refined Project) with the removal from the plan of the 200 veteran housing units (175,365 square feet) and the addition of three new hospital components totaling up to 180,000 square feet:

- 85,000 square foot Skilled Nursing Facility (SNF), with up to 150 beds
- 55,000 square feet Residential Treatment Program (RTP) consisting of five modules of 11,000 square feet each and a total of 80 beds.
- 40,000 square feet Recuperative Care Center (RCC) with up to 50 beds

Buildings would be up to three stories (up to 42 feet tall).

On completion of these components there would be 438 beds on the campus (158 hospital beds and 280 nursing, treatment and recuperative beds that would not be licensed by the Office of Statewide Health Planning and Development – OSHPD). As discussed in more detail below the operational characteristics of the RLANC Refined Project would result in similar impacts to the 2013 and 2014 Refined Projects and fewer impacts than the Original Project.

B. CEQA Requirements

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

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

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

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

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

- (a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:
 - (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
 - (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

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

The proposed 2019 RLANC Refined Project is described in Section 2 of this Addendum and would be within the assumptions for construction and operation analyzed in the RLAMC FEIR as well as subsequent addendums.

The proposed refinements to the RLANC (2019 RLANC Refined Project) have been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the Guidelines. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified RLAMC FEIR is the appropriate environmental documentation under CEQA for the refinements to the RLANC Project.

Section 3 discusses issue-by-issue how the impacts anticipated for the proposed RLANC Refined Project would be within those previously identified in the RLAMC FEIR and approved Addenda. Mitigation measures included in the RLAMC FEIR would continue to apply to the 2019 RLANC Refined Project to reduce potential significant impacts as feasible.

C. Adopted Mitigation Measures and Refinements

Findings of Fact and a Statement of Overriding Considerations were adopted in connection with approval of the Original Project. As discussed further below, significant impacts were identified for the following: aesthetics (shade/shadow), air quality (cumulative), noise (construction), population/employment/Housing (cumulative), utilities (solid waste). The RLAMC FEIR identified the mitigation measures shown in **Table 1**. These mitigation measures were included in a Mitigation Monitoring and Reporting Program adopted at the same time that the RLAMC FEIR was certified (September 1992).

Over time changes in regulations, available technology as well as experience in developing structures to date has resulted in the need to modify/clarify some of the mitigation measures (as shown in **Table 1**). Changes to energy measures result in further reductions in energy use. Changes to public services measures reflect revised codes. These refinements to mitigation measures result in equivalent or more effective mitigation and do not result in increased impacts.

TABLE 1 ADOPTED MITIGATION MEASURES AS REVISED	
Aesthetics	
•	Exteriors of buildings shall consist of materials which have relatively low reflectance such as neutral-colored, medium textured concrete and/or painted stucco.
•	Building colors and materials shall be consistent, with stone and tile accents to keep the southwestern theme to maintain a consistent design style throughout the project.
•	The project shall use glass which has a relatively low reflectance.
•	The project shall use landscaping and plant materials to decrease reflectivity of hardscape surfaces.
•	Extensive use of taller, fast growing trees shall occur along the north property line of the project site to reduce view impacts.
•	All project lighting shall be of low-intensity, low-throw type lighting including outdoor parking areas. Exterior building courts and corridor illumination shall be designed to minimize intrusive light and glare to nearby driveway entrances. Night lighting shall be directed toward the center of the site.
•	The parking structure shall be designed to prevent headlights from shining out on the north side of the site.
Air Quality	
•	All unpaved demolition and construction areas will be wetted during excavation to reduce dust emissions and meet SCAQMD Rule 403. Wetting could reduce particulate emissions (dust) by 50%.

TABLE 1
ADOPTED MITIGATION MEASURES AS REVISED

- General contractor shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading or unloading queues will be kept with their engines off, when not in use, to reduce vehicle emissions. Trucks carrying earth materials to and from the site shall be covered to reduce nuisance dust. Construction activities shall be phased and scheduled to avoid emissions peaks and shall be discontinued during first- and second-stage smog alerts.
- Project sponsor shall work to reduce construction-related traffic congestion by:
 - Scheduling operations affecting traffic during off-peak hours;
 - Providing a flag-person to guide traffic properly;
 - Minimizing obstruction of through traffic lanes.
- The project includes the replacement of an outdated, inefficient power plant with a new, state-of-the-art central utility plant designed with the best available control technology which will meet AQMD requirements. *[Measure completed.]*
- Convenient access to existing or any future public transportation system or transit stops will be incorporated into the design of the project, to encourage use of mass transit.
- Implementation of a ~~SCAQMD~~ Transportation Demand Management (TDM) program, including encouraging employers to provide carpool, vanpool or transit use incentives to reduce project traffic.

Geology and Soils

- Existing storm drain facilities on-site will be upgraded to adequately transport stormwater runoff to existing County storm drains facilities on Imperial Highway and Old Rives School Road.
- The project shall be built in conformance with the Uniform Building Code.
- The project shall underground all utilities to eliminate the potential safety hazard caused by falling overhead wires.
- A foundation investigation shall be conducted for each new building to determine structural load.

Greenhouse Gases/Energy

- The project shall comply with Title 24 established by the California Energy Commission regarding energy conservation standards. The standards relate to insulation features that shall be incorporated into the design of the proposed project.
- Consultation with the Southern California Edison Company and Southern California Gas Company regarding feasible energy conservation measures that could be incorporated into the design of the project.
- Ensure that buildings are well-sealed to prevent outside air from infiltrating and increasing space conditioning loads.
- Finish exterior walls with light-colored materials with high emissivity characteristics to reduce cooling loads.
- Finish interior walls with light-colored materials, except where dark colors are preferable for aesthetic effect, to reflect more light and thus increase lighting efficiency.
- Window systems will be designed to reduce thermal gain and loss and thus cooling loads during warm weather and heating loads during cool weather.
- ~~Fluorescent and high-intensity discharge (HID)~~ Lamps which give the highest light output per watt of electricity consumed will be installed wherever possible including all street and parking lot lighting to reduce electricity consumption.
- ~~Occupant-controlled light switches~~ Occupancy sensors and thermostats to permit individual adjustment of lighting, heating and cooling, to avoid unnecessary energy consumption will be installed.
- Mechanical systems (HVAC and lighting) in the buildings will be controlled with timing programmable systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Install low- and medium-static pressure terminal units and ductwork to reduce energy consumption by air distribution systems.
- A performance check of the installed space conditioning system should be completed by the developer/installer prior to occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.
- Install thermal insulation in walls and ceiling which meets or exceeds requirements established by the California Code of Regulations.
- Install heat-reflective ~~draperies~~ window coverings on appropriate exposures.

TABLE 1
ADOPTED MITIGATION MEASURES AS REVISED

- Install time-controlled and/or occupancy sensors (as appropriate) for interior and exterior public area lighting limited to that necessary for safety and security.
- Design the project to focus pedestrian activity within sheltered outdoor areas.
- Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.
- Install high-efficiency air conditioning controlled by computerized energy-management system. Where central systems are proposed, which provides provide a-variable-air-volume systems which results in energy consumption and avoids hot water energy consumption for terminal reheat. A 100% outdoor air-economizer cycle should be provided to obtain free cooling in appropriate climate zones during dry climatic periods. Where decentralized systems are proposed, provide variable refrigerant/water flow to reduce energy consumption. Provide sequentially staged operation of air-conditioning equipment in accordance with building demands, the isolation of air conditioning to any selected floor or floors, and consider the applicability of the use of thermal energy storage to handle cooling loads.
- The project will promote ridesharing and public transit use and the use of various incentives to encourage carpools. A reduction in project traffic would result in decreased transportation energy consumption.

Hazardous Materials

- The project sponsor shall remove and properly dispose of contaminated soil at the time cooling towers are dismantled.
- The project sponsor shall continue to adhere to UST regulations to ensure that all six tanks are in conformance with scheduled state, and federal requirements until such time as the USTs can be removed and/or replaced with approved USTs.
- An on-going asbestos removal program is underway to systematically abate all asbestos from the site.
- A Comprehensive Asbestos Survey shall be performed prior to any renovation or demolition activity in each building. As demolition or renovation occurs at each building on the north Campus, asbestos will be abated or encapsulated when encountered in building materials.

Land Use

- Project plans include the retention of existing landscaping around the perimeter of the site generally on the north and east of the project site which will act as a buffer between the existing neighborhood and the new medical buildings. Additional landscaping will be provided on the northern boundary of the site.

Noise

- Construction shall be restricted to the hours of 7:00 am to 7:00 pm, Monday through Saturday.
- Construction activities shall be conducted in shifts, scheduled so as to avoid high noise levels caused by operating several pieces of equipment simultaneously.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Noise-sensitive courtyard or recreational open spaces shall be designed to limit excessive noise levels caused by local traffic.
- Phasing of traffic signals shall be modified during peak hours on major streets (Imperial Highway) to lessen by-pass traffic in residential areas. *[Not under the control of LA County.]*
- The helistop will be used infrequently.
- Hospital Suppliers and vendors shall continue to limit deliveries to the loading dock to the hours between 10:00 am and 4:00 pm Monday through Friday.
- The Medical Center loading dock has been designed to be 16 feet below street level which would reduce noise on-site by 23 dBA. *[Completed.]*
- A decorative block wall, to help attenuate sound, shall be constructed along the northern property line upon completion of the project where needed to ensure adequate noise attenuation. *[Completed.]*
- As necessary noise barriers shall be installed along the project site's property lines; the height of the barriers will depend on the degree of any impacts.
- As appropriate position sound absorptive barriers or blankets as needed around construction equipment engines.
- All diesel engines shall have appropriate mufflers.

TABLE 1
ADOPTED MITIGATION MEASURES AS REVISED

- Noise measurements will be obtained at the site before construction starts and the need for noise barriers will be based on these measurements.
- Any pilings for the building's foundation system shall only be driven between the hours of 7:00 am and 3:30 pm.

Public Services

- Install an underground looped, dedicated fire suppression water distribution system connected to each building. Technical requirements shall be as required by LA County Fire Department. ~~set forth in the RLAMC Plan.~~
- Install sprinklers in new buildings and retrofit older buildings to remain with sprinklers, as per code requirements.
- Install ~~2.5-inch~~ appropriately-sized wet standpipe connection in all stairwells on each floor level and where recommended by the Downey Fire Department in consultation with the State Fire Marshall due to building distances from approved fire apparatus access.
- Coordinate all fire alarm and monitoring systems with the responding agencies (including City of Downey Fire Department, City of Downey Police Department, LA County Fire Department and LA County Sheriff) ~~into a centralized fire control room.~~
- Provide free-standing fire department connections at the east and west entrances to the project. Each connection shall have six, ~~2.5-inch~~ appropriately-sized hose connections and each hose will be equipped with a one-way clapper valve. In the event of a fire on the project site this six-way free-standing fire department connection would temporarily connect the Rancho Fire Protection Water System to the City of Downey water system.
- County security personnel shall be used to monitor and patrol the project site during project construction and operation.
- Entryways, elevators, lobbies, and parking areas shall be illuminated and designed with minimum dead space to eliminate areas of concealment.

Transportation, Circulation and Parking

- Imperial Highway and Old River School Road:
Widen the east side of Old River School Road on the north leg of the intersection.
Re-stripe the southbound approach to provide an exclusive left-turn lane, a shared left-turn lane/through lane, and two right-turn lanes.
Re-stripe the northbound approach to provide two left-turn lanes and a shared through/right turn lane.
Cause one of the Old River School Road northbound through lanes south of the intersection to become a left-turn only lane.

Utilities

- Water provision and infrastructure upgrades to support the project shall be completed prior to occupancy of each new building.
- A sewer study shall be performed to identify existing capacity prior to issuance of the first building permit.
- The project is required to comply with the County's AB 939 implementation program for the reduction of solid waste.

SOURCE: RLAMC FEIR

D. Existing and Cumulative Conditions

Redevelopment of the RLAMC is focused on consolidating and modernizing the campus. These changes are resulting in reduced occupancy (beds) and reduced building areas as compared to existing conditions at the time of the RLAMC FEIR. Therefore, impacts related to operations of the campus (including traffic and associated air emissions and noise) are decreasing (as compared to existing conditions at the time of the RLAMC FEIR) as a result of decreases in occupancy and building area. Because impacts associated with operations at the RLAMC are generally decreasing, the 2019 RANC Refined Project does not have the potential to contribute to conditions that may be increasing in the area (such as traffic). Therefore, there is no potential

for substantial changes with respect to the circumstances under which the 2019 RLANC Refined Project is undertaken to require major revisions of the RLAMC FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Existing Conditions 2019. The RLANC has experienced construction on the campus as anticipated in the RLAMC FEIR and 2013 and 2014 Addendums. There are no changes to the existing environment that would have the potential to make project impacts as evaluated in the RLAMC FEIR and 2013 and 2014 Addendums more adverse than previously anticipated. Existing land uses in the vicinity of the RLANC remain generally as described in these previous documents.

Cumulative Conditions: There are two cumulative projects in the vicinity of the RLANC:

Rancho Los Amigos South Campus. The Rancho Los Amigos South Campus (RLASC) includes up to a total of 650,000 square feet of developed floor area within the 74-acre site. The RLASC project would include the ISD Headquarters, Probation Department Headquarters, an office building for various County Departments, and all necessary infrastructure improvements. The RLASC project would also include development of tow parking structures. The RLASC project is intended to include the infrastructure necessary to operate the facilities, as well as ongoing maintenance and operation activities.

The ISD Headquarters building would include approximately 315,000 square feet of space and have a maximum height of approximately 90 feet or six stories above finished grade. The building may be combined with the proposed Probation Department Headquarters building, which would increase the overall building square footage by approximately 168,000 square feet (resulting in a total 483,000 square foot building). The ISD Headquarters would contain, offices and workstations, meeting spaces, support space, specialty spaces (such as labs, computer repair rooms, data centers, auditorium, and cafeteria), interior circulation, restrooms, break rooms, and common gathering areas. The proposed County Office Building would house general County administrative office uses for various County Departments. The proposed County Office Building would be up to approximately 167,000 square feet in size and have a maximum height of approximately 75 feet or five stories above finished grade.

As discussed under Air Quality below, the RLAMC FEIR identified a significant cumulatively considerable impact to air quality during construction and operation. As discussed under noise below, the RLAMC identified significant impacts with respect to construction noise. The RLASC project would be sufficiently distant and have different construction access, such that additional cumulatively considerable contribution to construction impacts (beyond the air quality impacts already identified) would not occur.

While the RLASC project would contribute traffic to local intersections, the 2019 RLANC Refined Project would result in reduced vehicle trips compared to trips associated with the number of beds existing prior to implementation of the RLANC project (540 hospital beds) and number of trips existing in 2013 and 2014 (associated with 396 hospital beds), as well as fewer trips than would have occurred under the Original Project and 2013 and 2014 Refined Projects. Therefore the 2019 RLANC Refined Project is not anticipated to contribute to cumulative traffic impacts. With respect to other cumulative impacts the 2019 RLANC Refined Project is not anticipated to result in additional significant cumulatively considerable contributions to impacts beyond those identified in the RLAMC FEIR (see below),

Gardendale Station. A Metro transit station (Gardendale station) for the West Santa Ana Branch light rail line is proposed by Los Angeles County Metropolitan Transportation Authority, approximately ½ mile from the RLANC. The Gardendale station is currently being evaluated and if it moves forward is anticipated to be operational in 2028 and would improve access to the site and enhance transit ridership. This project is sufficiently distant such that the 2019 RLANC Refined Project is not anticipated to result in a significant considerable contribution to cumulative impacts beyond those already identified in the RLAMC FEIR (see below).

City of Downey. The City of Downey has a number of planning documents designed to facilitate development in the City of Downey, including a Biomedical Overlay Zone that provides for development complementary to the RLANC (and other medical facilities in the City) and the proposed Rancho Los Amigos South Campus Specific Plan that is intended to complement the Gardendale Station by encouraging economic development and revitalization by removing regulatory obstacles to the reuse of existing structures and promoting infill development of vacant and underused properties. The 2019 RLANC Refined Project could result in overlapping impacts with other anticipated development in the City of Downey. However, the 2019 RLANC Refined Project is not anticipated to result in additional significant cumulatively considerable contributions to impacts beyond those identified in the RLAMC FEIR (see below).

E. Summary Comparison of Significant Impacts Identified in RLAMC FEIR Compared to Impacts of 2019 RLANC Refined project

Unavoidable significant adverse environmental impacts identified for the RLAMC FEIR for Tier II projects as compared to impacts of the 2019 RLANC Refined Project are summarized in **Table 2** below:

TABLE 2 COMPARISON OF SIGNIFICANT IMPACTS RLAMC FEIR COMPARED TO IMPACTS OF THE 2019 RLANC REFINED PROJECT		
Issue Area	RLAMC FEIR	2019 RLANC Refined Project
Aesthetics – Shadows	Shading from a four-story structure of single-family homes to the north on Quill Drive during late winter afternoons was found significant.	Shading of single-family housing to the north would not substantially change under the RLANC Refined Project. Buildings would generally be two stories and possibly up to three stories.
Air Quality -- Cumulative	While project emissions were identified as below SCAQMD thresholds, the RLAMC FEIR considered project emissions contribution to cumulative air quality impacts to be cumulatively considerable.	The RLANC Refined Project would result in construction of buildings less than previously contemplated and with less trip generation than would have occurred under previously contemplated development. Therefore, air quality impacts would be less than would have occurred under the previously approved project.
Noise (Construction)	Construction noise would increase noise on and adjacent to the development site during construction potentially affecting surrounding sensitive receptors including Apollo Park and residences in the project vicinity.	Construction noise would continue to occur as anticipated for the previously approved project. However, a block wall has been constructed along the northern property line since the FEIR analysis was completed which will reduce construction noise impacts to residential uses to the north.

TABLE 2 COMPARISON OF SIGNIFICANT IMPACTS RLAMC FEIR COMPARED TO IMPACTS OF THE 2019 RLANC REFINED PROJECT		
Issue Area	RLAMC FEIR	2019 RLANC Refined Project
Population/ Employment/ Housing -- Cumulative	The project was thought to have a cumulatively considerable contribution to an adverse impact on Jobs-Housing balance by creating a demand for 19 dwelling units (as a result of creating 108 new jobs).	The project has been substantially reduced in size, it represents continuation of a community-serving use, and would be consistent with Southern California Association of Governments (SCAG) growth forecasts for the region. (Sub-regional jobs-housing balance is no longer evaluated as a basis of determining impacts.)
Utilities – Solid Waste Cumulative	Project would result in 10 percent increase in waste (from 20.5 tons per week) that was considered a cumulatively considerable contribution to solid waste.	Since the FEIR analysis was completed, AB 929 has been implemented in LA County to require Government agencies to recycle at least 50% of their waste through recycling channels. The 2019 Refined Project would not be anticipated to result in a cumulatively considerable contribution to solid waste.

Other impacts analyzed in the RLAMC FEIR (aesthetics; cultural resources, energy, geology and soils; hazards and hazardous materials; hydrology and water quality; population and housing; public services; recreation; traffic and transportation; and utilities and service systems) were determined to be less than significant (see **Table 6** below for a summary comparison of all impacts analyzed in the RLAMC FEIR compared to impacts of the 2019 RLANC Refined Project).

F. Incorporation by Reference

The following documents are referenced in the preparation of this Addendum, consistent with Section 15150 of the *Guidelines*:

- County of Los Angeles, Rancho Los Amigos Medical Center, Final Environmental Impact Report (SCH No. 91071053), certified April 1992. Referred to herein as the RLAMC FEIR.
- Addendum No 1, Rancho Los Amigos North Campus Consolidation, adopted February 26, 2013.
- Addendum No. 2, North Campus Site Consolidation, adopted July 29, 2014

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

G. Summary of Effects

Section 3 of this Addendum includes a detailed evaluation of any potential change in effects associated with development of the 2019 RLANC Refined Project for each CEQA environmental issue area, organized consistent with the Appendix G of the State CEQA Guidelines. As summarized above, impacts would either be comparable or reduced as compared to those identified in the RLAMC FEIR. Therefore, as discussed in this 3rd Addendum, the 2019 RLANC Refined Project would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the CEQA Guidelines, and therefore an Addendum to the RLAMC FEIR is the appropriate CEQA document to address these changes.

2. DESCRIPTION OF PROPOSED 2019 RLANC REFINED PROJECT

A. Project Location and Background

The proposed RLANC Project is on the north campus of the Rancho Los Amigos Medical Center, located at 7601 East Imperial Highway, within the western edge of the City of Downey, County of Los Angeles, California (see **Figure 1**). The RLANC Project is located approximately 1 mile east of U.S. Interstate 710 (Long Beach Freeway), 1 mile north of U.S. Interstate 105, 3 miles west of U.S. Interstate 605 (San Gabriel River Freeway), and 3.3 miles southwest of U.S. Interstate 5 (Golden State Freeway).

The Rancho Los Amigos North Campus (RLANC) Project site is bound by Quill Drive to the north, Rives Avenue to the east, Imperial Highway to the south, and Old River School Road to the west. The RLANC Project site is located southeast of the Los Amigos Golf Course and approximately 1.7 miles southeast of the Downey Civic Center, approximately 5.3 miles northeast of the Compton/Woodley Airport, and approximately 7.1 miles north-northeast of the Long Beach Municipal Airport. The RLANC Project site is located within the U.S. Geological Survey (USGS) 7.5-minute series, South Gate, California, topographic quadrangle, in the southwest portion of the Santa Gertrudes (McFarland and Downey) Land Grant Boundary.

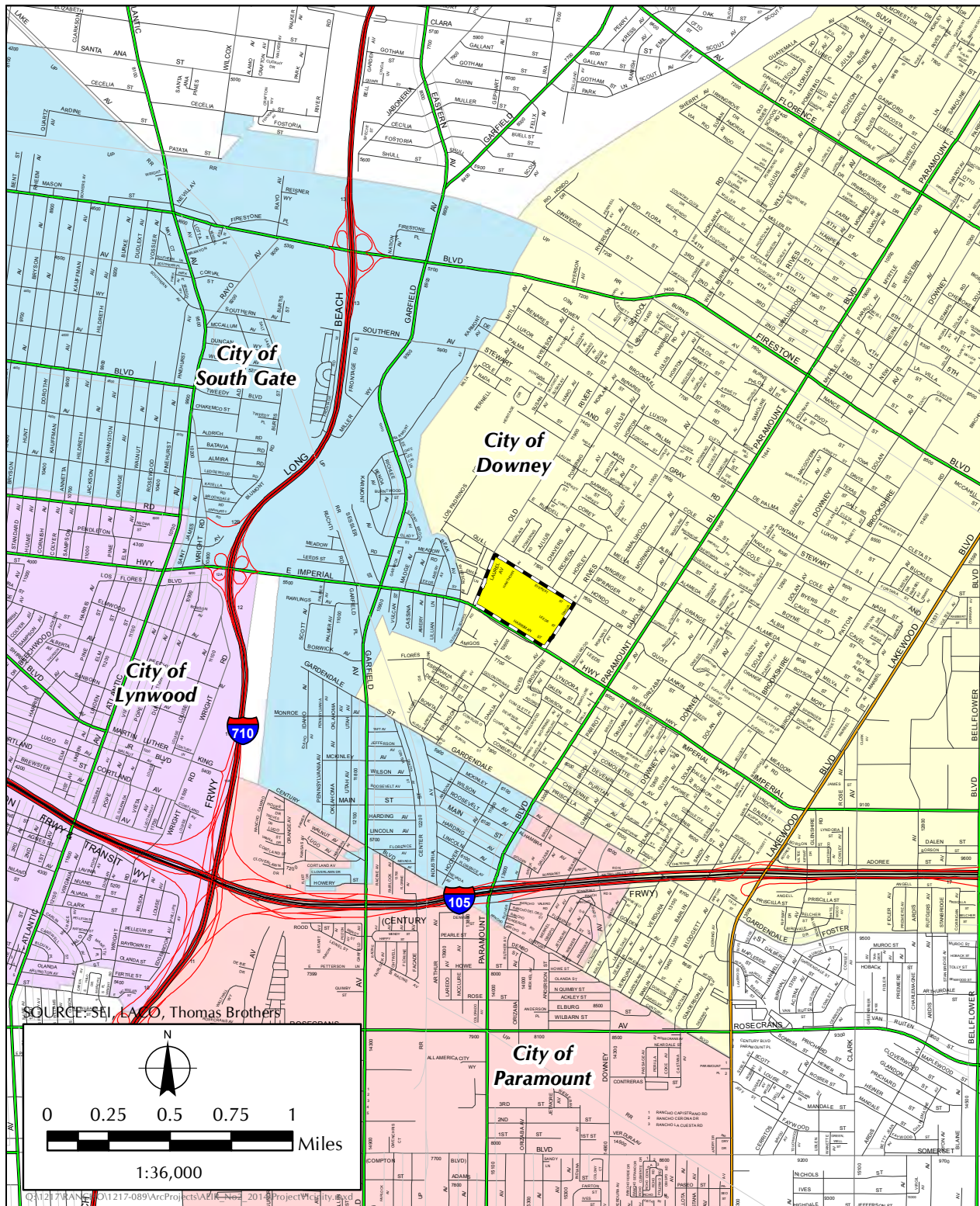
The elevation of the RLANC Project site ranges from 96 feet above mean sea level (MSL) near the intersection of Old River School Road and Imperial Highway to the southwest to approximately 100 feet above MSL near the intersection of Quill Drive and Rives Avenue to the northeast.

The County has owned and operated the RLANC Project site since the 1880s, when it was established as a tuberculosis sanitarium and poor farm.

The Rancho Los Amigos Medical Center is a renowned public health care facility, ranking among the nation's top 10 rehabilitation centers. Its team of highly qualified rehabilitation experts blends unmatched experience with the latest technologies, which has led to many important advances in the art and science of rehabilitation medicine. The Rancho Los Amigos Medical Center performs a critical function in meeting the nation's medical needs.

Due to continuing local resource constraints that have resulted in the closure of numerous regional hospitals and clinics, coupled with a continuing desire to improve the operational efficiency of the Rancho Los Amigos Medical Center, the County has refined the design and operations of the project in order to consolidate all medical facilities and services on the north campus, thereby providing a cost-effective medical facility.

The proposed 2019 RLANC Refined Project replaces a previously contemplated 200-unit veteran housing project as well as 42 hospital beds with three new components intended to provide services to County populations in need: 1) Skilled Nursing Facility (SNF), with up to 85,000 square feet and up to 150 beds; 2) Residential Treatment Program (RTP) consisting of five modules of 11,000 square feet each and a total of 80 beds; and a Recuperative Care Center (RCC) with up to 50 beds.



2019 RLANC Refined Project ■

Figure 1

2019 RLANC Refined Project Location

RLAMC Final EIR and Addendums 1 and 2

RLAMC FEIR

The Original Project (redevelopment of the Rancho Los Amigos Medical Center North Campus) evaluated in the RLAMC FEIR consisted of expanding development of the 48-acre RLAMC from 1,014,846 square feet of hospital-related uses on the RLAMC Project site to a total of 1,350,029 square feet. The Original Project was to include 600 beds on completion. The RLAMC FEIR evaluated demolition of 356,000 square feet of space and a net increase of 350,183 square feet and 60 beds. **Figure 2** shows the location of construction projects anticipated to occur and analyzed in the RLAMC FEIR.

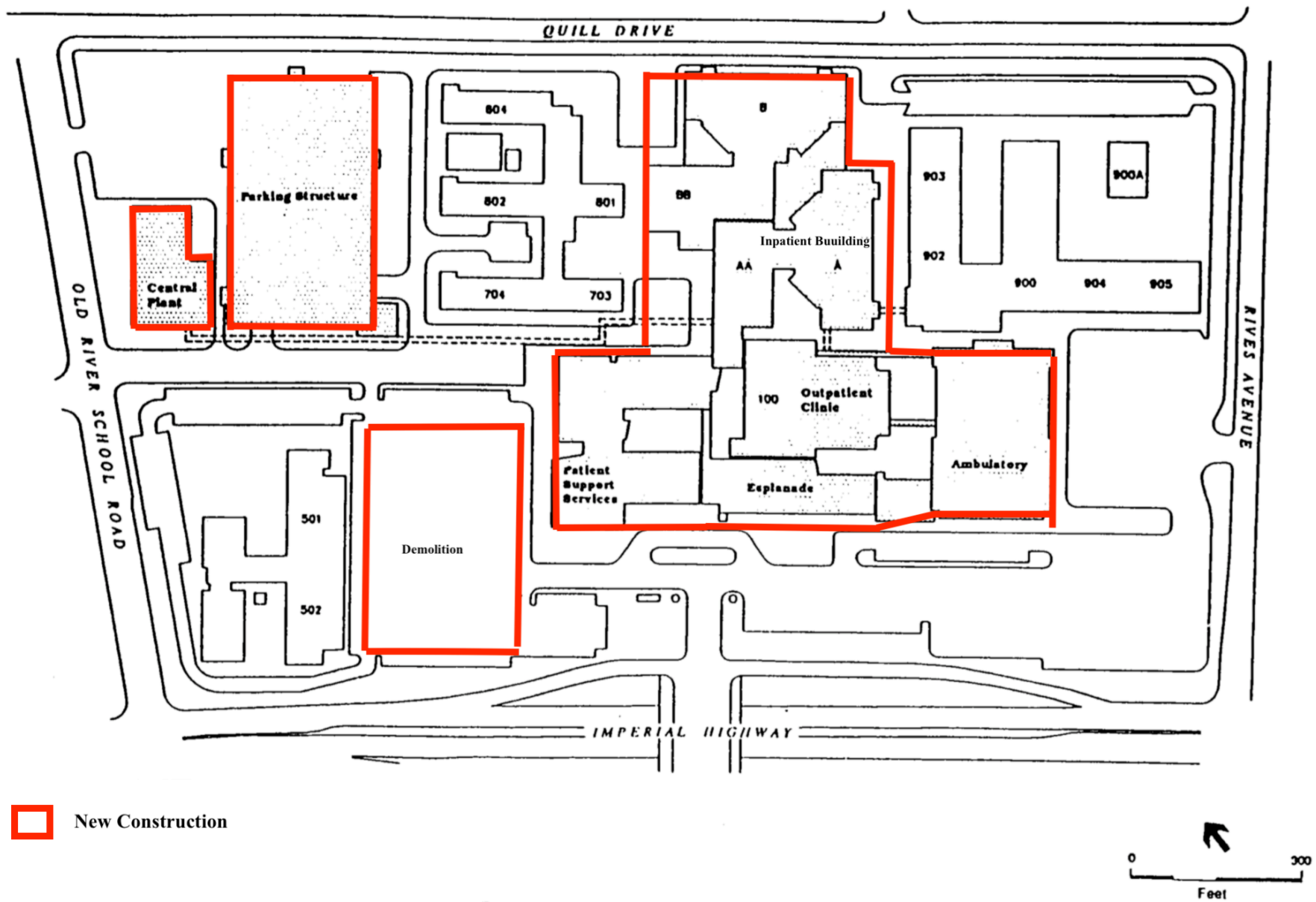
2013 RLAMC Refined Project, 1st Addendum (North Campus Site Consolidation)

The 1st Addendum to the RLAMC FEIR (2013 Addendum) addressed a reduction in the size of hospital-related facilities. The 2013 RLAMC Project included renovation of 412,808 square feet (plus retention of the parking structure and safety police building), 521,000 square feet of demolition, and construction of 353,365 square feet of new buildings. The 2013 RLAMC Project analyzed in the 2013 Addendum resulted in a net reduction of 596,349 square feet of hospital related uses as compared to the Original Project (not including parking), for a total of 768,680 square feet of hospital space including 200 beds and 200 veteran housing units. The 2013 RLAMC Project resulted in consolidation of hospital beds, relocation of the outpatient building, the addition of a kitchen to the Support Services Annex and the potential construction of a 175,365 square foot, 200-unit veteran housing project. Vacant underutilized buildings were to be demolished. **Figure 3** shows the 2013 RLAMC Refined Project site plan.

2014 RLAMC Refined Project, 2nd Addendum (North Campus Site Consolidation)

The 2nd Addendum to the RLAMC FEIR (2014 Addendum) addressed construction of temporary buildings, changes to location and phasing of proposed construction and changes to phasing of demolition activities:

- Separation and relocation of the previously approved 12,000-square-foot warehouse (identified as part of the Outpatient Building in Addendum No. 1, moved to the northwest corner of the campus in Addendum No. 2).
- Designation of approximately 13,000 square feet for a new Accessible Gymnasium, Wellness and Aquatic Therapy Center building, immediately south of the Outpatient Building.
- Construction of up to 55,000 square feet of temporary modular buildings to support construction oversight and the provision of outpatient services on an interim basis until the occupancy permit is issued for the new Outpatient Building.
- Accelerate construction of the extension of the Jacqueline Perry Institute (JPI) into Phase I. Delay demolition of up 361,000 square feet of the 521,000 square feet of existing structures.



SOURCE: RLAMC FEIR

2019 RLANC Refined Project ■

Figure 2
Original RLANC Project Site Plan



SOURCE: 2013 Addendum

2019 RLANC Refined Project ■

Figure 3
2013 RLANC Project Site Plan

The second Addendum notes: “[t]here are up to four buildings on the South Campus that may be used to temporarily house employees and services that would normally be provided on the North Campus during the construction phase of the project. The use of these buildings may involve interior improvements such as cleaning and painting. These building are in use as a regular part of campus operations, and their potential use in conjunction with the project construction phasing is not anticipated to generate new significant environmental issue or substantially more adverse impacts than those evaluated for the approved project.” All other components of the RLANC remained as contemplated in 2013. **Figure 4** shows the 2014 RLANC Refined Project Site Plan.

Current Status of Remaining Previously Approved RLANC Projects

There are a number of projects that remain to be completed on the campus that were contemplated in previous environmental documents:

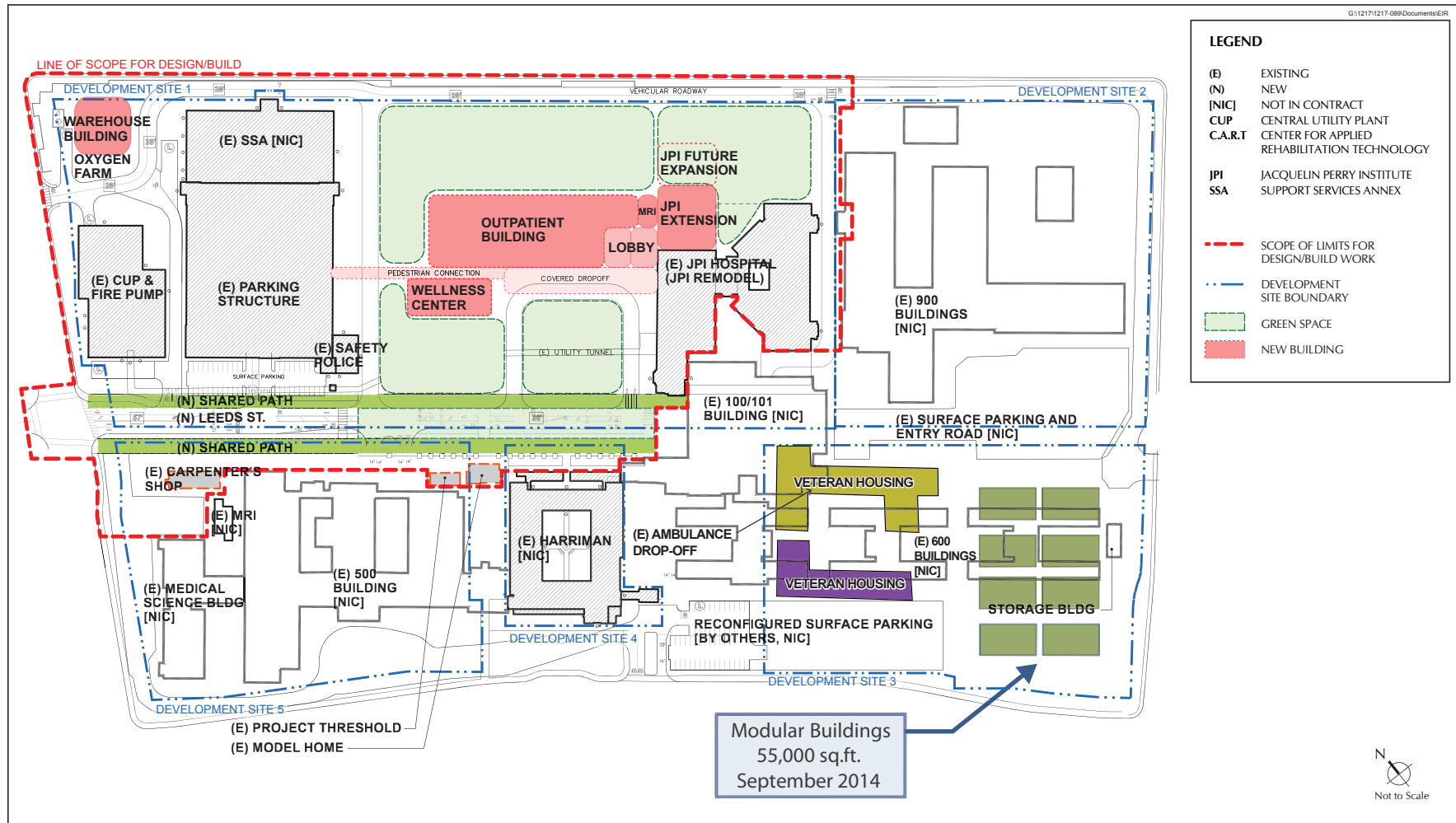
- Renovation of the Harriman Building – anticipated to occur Summer 2019 through Spring 2021.
- Renovation of the Support Services Annex (SSA) – anticipated to occur Summer 2018 to Fall 2019.
- Infrastructure improvements including extension of Leeds Street (an internal roadway that allows transit access to the RLANC previously approved in coordination with the City of Downey and Metro) and utility construction.
- Demolition of buildings previously identified for removal and analyzed in prior environmental documents:
 - MRI, Med Science, Carpentry Building 503 – Spring 2019 to Fall 2019
 - 900s Building -- Summer 2019 to Fall 2019
 - Other buildings – Spring 2021 through Summer 2021.

B. Assumptions in RLAMC FEIR and Addendums

Previously, construction was anticipated to occur either concurrently or in two phases. With construction anticipated to be completed as late as 2020. The environmental analysis was based on assumptions regarding construction equipment and construction crew vehicles.

Construction equipment would be equipped with state-of-the-art noise-muffling devices. To meet noise standards, barriers/curtains would be utilized during construction. The barriers/curtains would be used to shield the equipment from the receiver of noise. The height and length of the barrier/curtain to be determined based on location of demolition/construction and receiver. Construction equipment would be turned off when not in use. The construction contractor would ensure that all construction and grading equipment is properly maintained. All vehicles and compressors would utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times.

Work expected to be largely undertaken in previously engineered fill materials. If site-specific geotechnical investigations result in a determination of the need to encroach on native soils, such excavations would be monitored by a qualified archeologist and paleontologist. Construction monitoring and recovery of any resources from the grading sites would be undertaken in accordance with industry standards for such recovery including those established by the Society of Vertebrate Paleontology such that potential for significant impacts to resources through the inadvertent loss of important scientific information would be avoided.



The recommended procedure to be followed in the event of an accidental discovery of archaeological resources during construction includes stoppage of work on the site of the discovery, immediate evaluation of the find by a qualified archaeologist, and, if warranted, excavation and recovery of significant archaeological resources.

In accordance with Health and Safety Code Sections 7050 and 7052, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance would cease, and the County Coroner would be notified. Furthermore, in accordance with the Public Resources Code, Section 5097.98, the Native American Heritage Commission would be notified in the event that the County Coroner determines that the remains are Native American.

Site preparation and construction is required to be in accordance with all federal, state, and county building codes. The County is required to ensure that source-reduction techniques and the development of recycling programs during construction and operation of the RLNC Project are considered and implemented whenever possible. The construction contractor is required to incorporate BMPs consistent with the guidelines provided in the California Storm Water Best Management Practice Handbooks: Construction. BMPs to control surface runoff and soil erosion are required for construction taking place during rainy periods.

Anticipated construction equipment assuming simultaneous construction rather than two phases is shown in **Table 3**.

TABLE 3 ANTICIPATED CONSTRUCTION EQUIPMENT	
Approximate Quantity Per day	Type of Equipment or Vehicle
Demolition	
1	Water Trucks
1	Hydraulic Crane
4	Dump Trucks
4	Graders/Dozers
10	Demolition Crews (four-man crews) ^a
60	Crew Vehicles
Construction	
2	Water trucks
4	Graders/Dozers
4	Hydraulic Crane
9	Dump Trucks
10	Material Deliveries
20	Concrete/Cement Trucks
140	Crew Vehicles
^a Buildings previously identified for removal and analyzed in prior environmental documents. No additional demolition is proposed in the 2019 RLNC Refined Project.	

Construction staging would occur on and immediately adjacent to construction sites for each building.

C. Proposed 2019 RLANC Refined Project

Project Characteristics

The County is no longer proposing 200 housing units for veterans and is now proposing to include three new components:

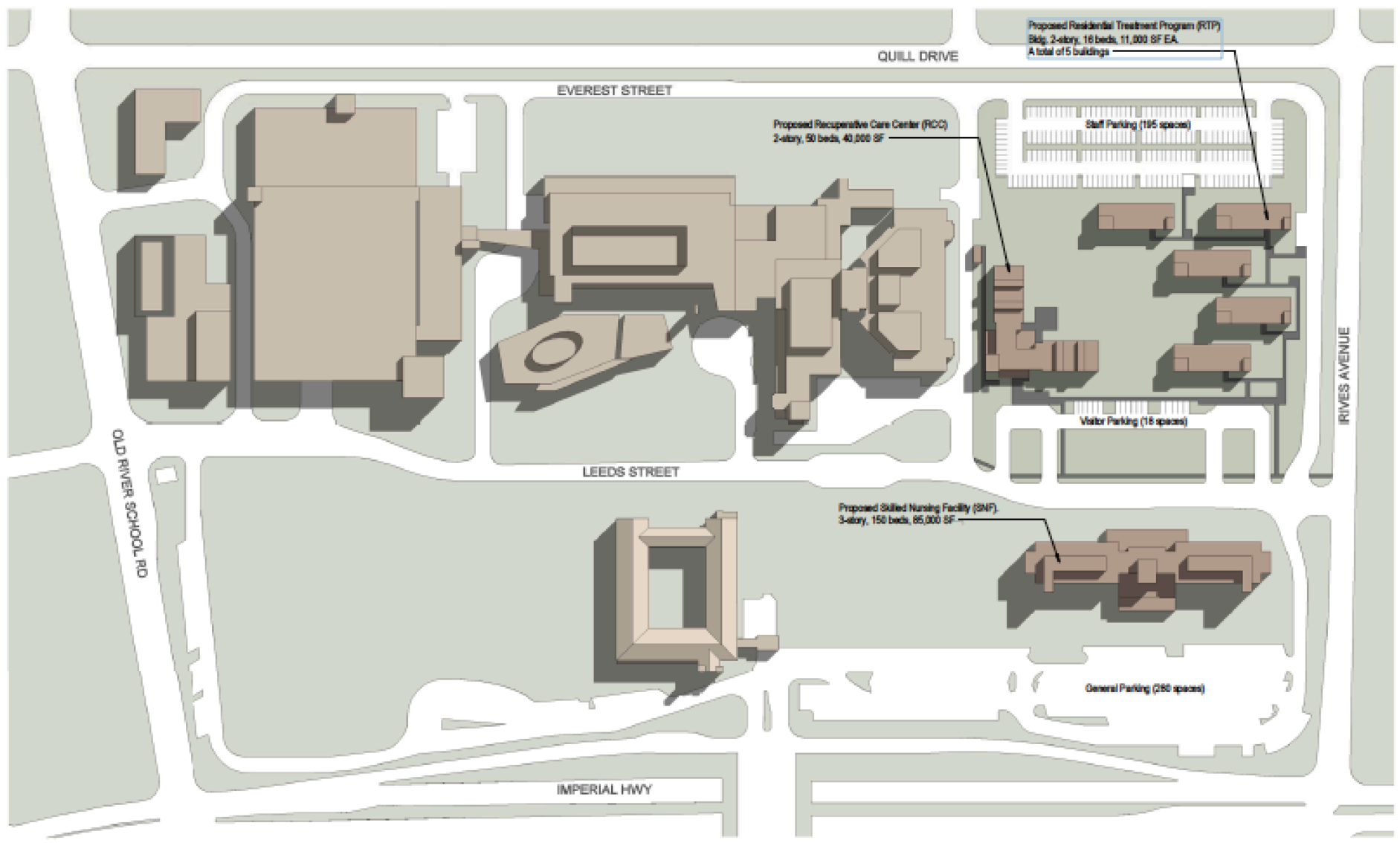
- 85,000 square foot Skilled Nursing Facility (SNF), with up to 150 beds
- 55,000 square feet Residential Treatment Program (RTP) consisting of five modules of 11,000 square feet each and a total of 80 beds.
- 40,000 square feet Recuperative Care Center (RCC) with up to 50 beds

Each building and its operational characteristics are discussed further below. Buildings are anticipated to be up to three stories and 42-feet tall. Building footings are anticipated to be shallow requiring disturbance to a depth of about five feet (i.e. generally within previously disturbed soils). No additional demolition beyond what was anticipated in prior environmental documents is proposed.

The 2019 RLANC Refined Project Site Plan is shown in **Figure 5**.

TABLE 4 2019 RLANC REFINED PROJECT COMPONENTS			
Project Elements	Status	Building	Area (square feet)
Renovations.	Completed	JPI Building	236,645
	In Progress	SSA Renovation	67,072
	In Progress	Harriman Building	75,815
	Completed	Central Utility Plant	33,276
Subtotal Renovated Buildings			412,808
Completed New Buildings	Completed	Safety Police Building	2,507
	Completed	JPI Building Extension and warehouse	49,021 (JPI extension) 13,689 (warehouse)
	Completed	Outpatient Facilities Accessible Gymnasium, Wellness and Aquatic Therapy	114,030 (outpatient building) 13,115 (wellness center/ gym/ aquatic therapy)
Subtotal New Buildings			192,362
Removed from Project	Removed	Veteran Housing	(175,636 – 200 residential units)
Proposed New Buildings	Proposed	SNF	85,000 (150 beds)
	Proposed	RTP	55,000 (80 beds)
	Proposed	RCC	40,000 (50 beds)
Subtotal Proposed New Buildings			180,000 (280 beds)
Total Buildings			785,170
Completed Structured Parking	Completed	Parking Structure	393,590 (1,146 spaces)
	Completed	Parking Structure Addition	87,630 (216 spaces)
Total New Structure Parking			481,220 (1,362 spaces)

In addition to structured parking, the RLANC would provide up to 493 surface parking spaces as needed for the proposed new buildings and other on-campus uses.



SOURCE: County of Los Angeles, 2019

2019 RLANC Refined Project ■

Figure 5

Proposed 2019 RLANC Refined Project Conceptual Site Plan

TABLE 5
APPROVED AND PROPOSED COMPONENTS*

Project Element	1992 Project/EIR	2013 RLANC Project	2014 RLANC Project	2019 Refined Project
New Construction	600 beds 350,183 sf net increase in building area compared to original campus	200 beds + 200 housing units 246,166 sf less building area than original campus	Same as 2013	438 beds 229,676 sf less building area than original campus
Demolition	356,000 sf	521,000	No change.	No change.
Overall Total Building Area	1,365,029 (no structured parking)	768,680 sf (not including structured parking)	Same as 2013	785,170 (not including structured parking)
Parking Structure	990 spaces	393,590 sf (1,146 spaces) 87,630 sf (216 spaces)	393,590 sf (1,146 spaces) 87,630 sf (216 spaces)	393,590 sf (1,146 spaces) 87,630 sf (216 spaces)

Skilled Nursing Facility (SNF)

The SNF would be located where the one-story 600s Buildings (previously identified for demolition to make way for the previously proposed veterans housing and evaluated as part of previous environmental documentation) are currently located in the southeast quadrant of the RLANC. The 600s Buildings have about 46,100 square feet of space and house gift shop, medical records, patient financial services, plant maintenance, audiology, thrift shop, social work, and housekeeping.

The SNF would be a three story, 42-foot tall building. It would include up to 85,000 square feet of space and up to 150 beds as well as ancillary space including 1) diagnostic, treatment exam, treatment and consultation rooms; 2) administrative space including offices and conference space; 3) general support space including nurses stations, storage, pharmacy, dietetic services, staff lounge and lockers, laundry, recreation areas, special purpose room, medical records; 4) public space including lobby, waiting, admitting, and restrooms; and 5) patient bedrooms and restrooms.

Patients are anticipated to be referred from Department of Health Services (DHS) acute care settings. In this case, most of the patients will come from the Rancho hospital (JPI). Patients will be referred to the SNF and/or RCC; the average length of stay is anticipated to be between 6 and 9 months.

The SNF would have up to about 90 employees (45 employees 8:00 am to 4:30 pm, 30 employees 4:00 pm to 12:30 am, 15 employees 12:00 am to 8:30 pm).

Residential Treatment Program

The RTP would be located where the one-story 900s Buildings (previously identified for demolition and evaluated as part of previous environmental documentation) are currently located in the northeast corner of the RLANC. (The 900s Building currently has about 77,900 square feet of space and 115 beds.)

The RTP would be comprised of five two-story modular of up to three-stories, 42-feet tall. Each of the five modules would be up to about 11,000 gross square feet for a total of up to about 55,000 square feet of space and up to 80 beds. Each of the modules would include living areas and ancillary areas: 1) public space (lobby/waiting area and multi-purpose room); 2) staff area (small office area, nursing station, breakroom and storage); 3) living suite area including

toilets/showers, living room, laundry, and beds (16 beds per module); and 4) support areas (elevator room, electrical, restrooms, medications, laundry).

RTP beds are proposed to be centrally accessed through The Department of Mental Health (DMH) Countywide Resource Management (CRM). The County hospital Psychiatric Emergency Services (PES) and inpatient treatment teams will work collaboratively with DMH hospital liaisons to identify potential referrals for diversion to RTP programs. Urgent Care Centers (UCCs) will refer directly to CRM. In addition to working collaboratively with hospital liaison, CRM will work collaboratively with law enforcement to process referrals from the proposed pre-booking diversion program and implementation of an Assisted Outpatient Treatment program. The RTP program will have a goal of “no refusal” for admissions. The program will accept admissions twenty-four hours a day, seven days a week (24/7). The program will have protocols for responding to suicide risks, threats, and acts of violence, as well as refusal to participate in treatment. The average length of stay in the program is 10 to 14 days.

The RTP would have up to about 187 employees (10 employees 7:00 am to 3:30 pm, 90 employees 8:00 am to 5:00 pm, 62 employees 3:00 pm to 11:00 pm, 25 employees 11:00 pm to 7:30 am).

Recuperative Care Center

The RCC would be co-located with and adjacent to the RTP.

The RCC would be a two-story (up to three-story) building. It would include up to about 40,000 square feet of space and up to about 50 beds. The building would include living areas and ancillary areas: 1) public/patient area (lobby, security, dining, kitchen, counseling, exam room, multi-purpose room, exercise room, treatment room, activity room, quiet room, computer room, physical therapy); 2) staff areas (offices, vitals room, conference room, break room, storage); 3) living suite (toilets/showers, living room, laundry, beds); and 4) support areas (elevator room, electrical, janitor's closet, restrooms, medications, laundry, staff restrooms and lockers, medications, storage and laundry).

See discussion above regarding SNF patient referrals; RCC patient referrals would be as discussed above.

The RCC would have up to about 30 employees (15 employees 8:00 am to 4:30 pm, 10 employees 4:00 pm to 12:30 am, 5 employees 12:00 am to 8:30 pm).

Lighting

In accordance with required mitigation, all exterior project lighting would be of low-intensity, low-throw type lighting, and night lighting would be directed toward the center of the site.

Landscaping

The landscaping plan has yet to be determined. In general removal of healthy trees will be avoided to the extent feasible. Any trees removed on the campus are to be replaced at a ratio of 1:1 in accordance with the LA County Department of Public Works Policy. In general, ample green space/landscaping of the RLANC is anticipated.

Access

At the request of Metro, the internal east-west roadway (Leeds Street) is being reconfigured to pass through the site from Old River School Road to Rives Avenue. Metro requested this reconfiguration of internal roadways in order to provide through routes for two local Metro Bus lines that currently turn around within the parking lot and passenger loading area on the east side of the campus. Currently Leeds Street extends half way in to the site from Old River School Road and terminates in a cul-de-sac. A new signal (approved by the City of Downey) is to be added at the intersection of Leeds Street and Old River School Road. The new configuration of Leeds Street will facilitate transit access to the site as buses will be able to pass through the site without turning around. These changes would not result in increased or new project impacts.

Days and Hours of Operation

The facilities would operate 24 hours a day 7 days a week. As with other healthcare-related facilities night-time operations would be at a lower intensity as indicated by the staffing discussed above.

Demolition and Construction Activities

All demolition activities were addressed in prior environmental documents (2013 RLANC and 2014 RLANC Addendums); the schedule of demolition activities is discussed above under "Current Status of Remaining Previously Approved RLANC Projects"). Construction activities would be similar to those that have already occurred and would be within the assumptions made with respect to previously anticipated development on the RLANC. The SNF would require export of approximately 2,222 cubic yards of soil, the RCC would require export of about 1,111 cubic yards of soil and the RTP would require export of about 1,388 cubic yards of soil. Daily construction activities would be similar to those that would have occurred with the veteran housing project, although in a different location.

A number of mitigation measures were included in the RLANC FEIR to reduce construction emissions. In addition, since the RLANC FEIR analysis was completed, emission controls have made construction equipment much less polluting. Mitigation measures are also required to reduce construction noise. The concrete wall on the northern property line in particular will reduce construction-related noise in the residential community to the north. Therefore, the 2019 RLANC Refined Project would not increase construction impacts on air quality and noise as compared to what was previously analyzed.

Schedule

The RCC construction would begin in November 2019 and buildings would be completed in two parts – 25 bed in June 2020, and 25 beds in July 2021. Grading would require about 3 months. Building construction would take about 4 months and 6 months. Architectural coatings would require 1 month and 1.5 months.

The RTP would begin construction in November 2019 and be completed in December 2020 and would include 3 months of grading. There would be a gap between grading and building construction of about 4 months and then building construction would require about 5 months, and architectural coatings would require about 1 month.

The SNF construction is currently scheduled begin in Summer 2021 and be completed in Fall 2022 (14 months total) and would include about 3 months of grading, about 9 months of building construction and 1 to 2 months of finishing/painting.

Discretionary Actions and Approvals

The development of the 2019 RLANC Refined Project requires approval by the Los Angeles County Board of Supervisors.

The City of Downey Fire Department will review the site plan.

3. ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

The certified Final EIR for the Rancho Los Amigos Medical Center Project (RLAMC FEIR) determined that the Original RLAMC Project would result in significant and unavoidable impacts in the issue areas identified below. The following discussion also compares impacts of the currently proposed 2019 RLAMC Refined Project to the conclusions of the RLAMC FEIR and two subsequent addendums.

1. **Aesthetics -- Shadows:** Shading from a four-story structure of single-family homes to the north on Quill Drive during late winter afternoons was found significant. Shading of single-family housing to the north would not substantially change under the RLAMC Refined Project. Proposed 2019 RLAMC Refined project new buildings would generally be two stories and possibly up to three stories and would be set back from the northern property line.
2. **Air Quality – Cumulative:** While project emissions were identified as below SCAQMD thresholds, the RLAMC FEIR considered project emissions contribution to cumulative air quality impacts to be cumulatively considerable. The RLAMC Refined Project would result in construction of buildings less than previously contemplated and with less trip generation than would have occurred under previously contemplated development. Therefore, air quality impacts would be less than would have occurred under the previously approved project.
3. **Construction Noise –** Construction noise would increase noise on and adjacent to the development site during construction potentially affecting surrounding sensitive receptors including Apollo Park and residences in the project vicinity. Construction noise would continue to occur as anticipated for previously approved project. However, since the FEIR analysis was completed a concrete block wall has been constructed along the northern property line which will reduce construction noise impacts to residential uses to the north.
4. **Population/Employment/Housing – Cumulative:** The project was thought to have a cumulatively considerable contribution to an adverse impact on Jobs-Housing balance by creating a demand for 19 dwelling units (as a result of creating 108 new jobs). The RLAMC Refined Project would substantially reduce in size (occupiable building area and beds) as compared to the Original Project, it represents continuation of a community-serving use, and would be consistent with Southern California Association of Governments (SCAG) growth forecasts for the region. (Sub-regional jobs-housing balance is no longer evaluated as a basis of determining impacts.)
5. **Utilities – Solid Waste -- Cumulative:** Project would result in 10 percent increase in waste (from 20.5 tons per week) that was considered a cumulatively considerable contribution to solid waste. Since the FEIR analysis was completed, AB 929 has been implemented in LA County. It requires government agencies to recycle at least 50% of their waste through recycling channels. The 2019 Refined Project would not be anticipated to result in a cumulatively considerable contribution to solid waste.

All remaining impacts were found to be less than significant with mitigation incorporated, less than significant or no impact.

As documented in the analyses below and summarized in **Table 6** below, with the mitigation measures previously adopted with the RLAMC FEIR, as well as currently required regulations, impacts previously identified as significant would not be worsened, and no new significant or potentially significant impacts to the physical environment would occur as a result of the 2019

RLANC Refined Project. Accordingly, the following discussion supports the County's conclusion, pursuant to State CEQA Guidelines Section 15164, that an Addendum is appropriate, and supports a determination by the County that no subsequent EIR is required.

TABLE 6 SUMMARY OF IMPACTS -- RLAMC FEIR COMPARED TO IMPACTS OF THE PROPOSED 2019 RLANC REFINED PROJECT		
Impact	Level of Significance RLAMC FEIR	2019 RLANC Refined Project Comparison
Aesthetics		
Scenic vistas and scenic resources within a scenic highway.	<i>No impact.</i> The RLANC is not located in the vicinity of a scenic vista or a scenic highway.	<i>Similar impact.</i> No scenic vistas or highways to be impacted.
Degradation of visual character; or increases in shading of sensitive uses.	<i>Less than significant with mitigation.</i> With the mitigation measures the proposed improvements were considered to result in visual improvement by replacing deteriorated and modular buildings.	<i>Similar impact.</i> Proposed buildings would be consistent with previously proposed buildings.
Increase in light and glare.	<i>Less than significant with mitigation.</i> The project site is in a developed urban area that includes existing sources of light. Mitigation measures would ensure that lighting impacts remain below a level of significance.	<i>Similar impact.</i> Same impacts as for previously proposed development.
Agricultural and Forest Resources		
Impact on agricultural, forest land, timberland, and Williamson Contract.	<i>No impact.</i> There are no farmlands or forest lands on the site or in the vicinity. The site is completely urban.	<i>No change.</i> There are no farmlands or forest lands on the site or in the vicinity. The site continues to be completely urban.
Air Quality		
Air emissions during construction and operation.	<i>Significant impact.</i> The project was found to result in a cumulatively considerable contribution to air emissions after application of mitigation measures.	<i>Similar or less impact.</i> The 2019 RLANC would result in less construction than anticipated in the RLAMC FEIR and similar amounts of construction as anticipated in the two addendums. Therefore, impacts would not be greater than would have occurred under the Original Project.
Biological Resources		
There are a number of trees on the RLANC.	<i>Less than significant impact.</i> The RLANC site includes a number of trees and other ornamental landscaping. There are no riparian areas or wetlands. Impacts to biological resources was determined to be less than significant.	<i>Similar impact.</i> Trees may be removed as under previous plans. In general removal of healthy trees will be avoided to the extent feasible. Any trees removed will be replaced at a ratio of 1:1. County must comply with Migratory Birds Treaty Act to protect nesting birds.
Cultural Resources		
Historic Resources. The Harriman Building on the RLANC Campus is an historic building. No other historic building shave been identified. Archaeological, Paleontological and human remains impacts.	<i>Less than significant impact.</i> The Original Project included demolition of the Harriman Building. The 2013 and 2014 RLANC Refined Projects included renovation of this building. Development on the RLANC campus follows regulations and recommended procedures with	<i>Similar impact.</i> The Harriman building is being renovated under the previous Addenda. The 2019 RLANC Refined Project does not include any additional demolition beyond what has been previously proposed. Archaeological, Paleontological and human remains impacts would continue to be less than significant. Footings are anticipated to be shallow and generally within previously disturbed soils (about five feet).

TABLE 6 SUMMARY OF IMPACTS -- RLAMC FEIR COMPARED TO IMPACTS OF THE PROPOSED 2019 RLANC REFINED PROJECT		
Impact	Level of Significance RLAMC FEIR	2019 RLANC Refined Project Comparison
	respect to archaeological and paleontological resources.	
Geology and Soils		
Seismicity, erosion, unstable soils.	<i>Less than significant with mitigation.</i> As a result of compliance with existing regulations and mitigation. The project would not exacerbate existing geological conditions.	<i>Similar impact.</i> Similar impacts due to the same site conditions and compliance with existing regulations and required mitigation measures.
Greenhouse Gas Emissions/Energy		
GHG emissions would result from project development and use of energy.	<i>Less than significant.</i> With mitigation. The RLAMC identifies a number of mitigation measures to reduce energy consumption that would also reduce GHG emissions.	<i>Similar impact.</i> The RLANC Refined Project would be smaller than the Original Project and therefore would result in fewer construction and operational emissions.
Hazards and Hazardous Materials		
On-site hazardous materials associated with former uses of the property including older buildings with asbestos and lead based paint.	<i>Less than significant with mitigation.</i> As a result of previous use of the site and required mitigation.	<i>Similar impact.</i> Compliance with existing regulations and mitigation measures would result in impacts being similar impacts to RLAMC FEIR.
Hydrology and Water Quality		
Increased impervious surfaces resulting in increased runoff. Construction activities and polluted runoff and sedimentation.	<i>Less than significant.</i> Any impacts from increases in impervious surfaces would be reduced by compliance with regulatory requirements.	<i>Similar impact.</i> The impact would be similar as site conditions would be similar. The refined project will reduce impervious surfaces and introduce additional landscaped areas as compared to the Original Project.
Land Use and Planning		
Potential to divide a community and consistency with applicable plans.	<i>Less than significant impact with mitigation.</i> The RLANC project represents continuation of existing healthcare uses and would be consistent with applicable plans.	<i>Similar impact.</i> The 2019 RLANC Refined Project similarly represents a continuation of healthcare uses on the campus and would be consistent with applicable plans and policies.
Mineral Resources		
There are no mineral resources known to exist on the campus. The campus is an urban use.	<i>No impact.</i> Since there are no mineral resources known to exist on the RLANC.	<i>Same impact.</i> No mineral resources are known to exist on the RLANC.
Noise		
Construction noise and vibration impacts to adjacent uses. Operational noise from equipment and vehicles.	<i>Significant.</i> Based on anticipated construction equipment and distance to sensitive receptors. Mitigation would reduce noise but not below a level of significance. As a result of increased vehicle trips associated with operation of 600 beds, operational noise would increase but by a less than significant amount.	<i>Similar impact.</i> Similar construction activity at similar or greater distances to sensitive receptors (more than 100 feet to the closest receptor). The 2019 RLANC Refined Project would not result in an increase in trips compared to what was previously analyzed. Ultimate buildout would result in operational noise the same as or less than analyzed in the RLAMC FEIR (as a result of reduced beds and reduced trips).

TABLE 6
SUMMARY OF IMPACTS -- RLAMC FEIR COMPARED TO IMPACTS OF THE
PROPOSED 2019 RLANC REFINED PROJECT

Impact	Level of Significance RLAMC FEIR	2019 RLANC Refined Project Comparison
Population and Housing		
Induce population growth displace housing or people.	<i>Significant.</i> Based on job creation and associated demand for housing	<i>Less impact.</i> The 2019 RLANC would be consistent with adopted plans and policies that regulate growth and would be a continuation of a community-serving existing use. It would not displace any housing.
Public Services		
Impact to emergency access, police services, library services and parks.	<i>Less than significant with mitigation (fire and police). Less than significant (emergency access, library, parks).</i> Based on size of proposed development and continuation of existing use in newer buildings, impacts to Public Services would be less than significant.	<i>Similar impact.</i> The 2019 RLANC Refined Project would not generate an increase in vehicle trips or demand for public services as a result of development. Buildings would be reduced in size compared to original Project and therefore impact would be similar or less.
Recreation		
Impact on recreational facilities.	<i>Less than significant.</i> The employees, patients and clients are not anticipated to generate a substantial demand for recreational facilities. On-site recreational facilities would be available.	<i>Similar impact.</i> The 2019 RLANC Refined Project would similarly not generate a large demand for recreational facilities. And would have on-site recreational facilities available for use by facility occupants.
Transportation and Traffic		
Traffic impacts during construction; and impacts to local intersections and street segments during operation.	<i>Less than significant with mitigation.</i> Based on vehicle trips that would be generated by developed area as well as an increase in beds (total of 600) and required mitigation measures.	<i>Similar impact or less.</i> The 2019 RLANC Refined Project would generate less traffic than would have occurred with the Original Project (beds would be reduced to 438).
Utilities and Service Systems		
Impacts to wastewater, water, storm water and solid waste.	<i>Cumulatively considerable contribution to significant impact to Solid Waste.</i> Based on size of project and anticipated volume in solid waste and limited landfill capacity.	<i>Less impact.</i> AB 939 is being implemented and increase in solid waste would not be significant.

A. AESTHETICS

The potential for the proposed 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to aesthetics was evaluated in relation to the RLAMC FEIR and analyses contained in the subsequent two addendums and required mitigation measures contained in the RLAMC FEIR.

(a) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to impacts on scenic vistas?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified no impacts with respect to scenic vistas. The 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts on a scenic vista from those disclosed in the RLAMC FEIR. The 2019 RLANC Refined Project would affect the same area analyzed in the certified EIR. As with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not be located within the viewshed of a California Scenic Highway.¹ Scenic vistas are vista points that that command a panoramic and typically have a spectacular view by virtue of elevation differential and relative freedom from visual obstructions. The RLANC is not located in the vicinity of a scenic vista. Although not subject to the Downey Vision 2025 General Plan (Downey Vision 2025), the County reviewed Downey Vision 2025 and determined that the 2019 RLANC Refined Project would not adversely affect or obstruct the view of any scenic vista designated by the City of Downey (City). The proposed up to three-story buildings would not exceed proposed building heights as previously evaluated by the RLAMC FEIR and would not exceed the height of surrounding buildings. Therefore, compared to the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to aesthetics related to substantial adverse effects to scenic vistas.

(b) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant impacts with mitigation with respect to scenic resources. The nearest eligible or officially designated scenic highway or historic parkway is Interstate 110 approximately 14 miles north of the RLANC. Interstate 110 begins as a historic parkway in the City of Pasadena and travels southwest approximately 25 miles to terminate near downtown Los Angeles.² The nearest officially designated scenic highway is a portion of State Route 1 (Pacific Coast Highway) located to the south in the City of Long Beach approximately 15 miles from the RLANC. Therefore, there are no eligible or officially designated scenic highways traversing or adjacent to RLANC. Therefore, the RLANC cannot be viewed from either of these highways due to distance. Therefore, as with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or

¹ Caltrans, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/ accessed February 26, 2019

² Ibid

substantially more adverse significant impacts to aesthetics related to substantial damage to scenic resources within a state scenic highway.

(c) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to degradation of existing visual character or quality of the site and its surroundings?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified less than significant impacts with mitigation with respect to visual character. The 2019 RLANC Refined Project would not create a new or substantially more adverse significant impact to aesthetics related to the substantial degradation of the existing visual character of the RLANC and its surroundings from that disclosed in the RLANC FEIR. As with the approved project, the construction phase of the 2019 RLANC Refined Project could result in temporary adverse effect on the existing visual quality of the site and its surroundings due to the demolition, soil disturbance, waste debris generation, and security barriers required during the construction activities. However, it is anticipated that the potential impacts and short-term nature of the degradation of the visual character of the neighborhood would be less than significant.

As with previously proposed refinements to the RLANC Project, the 2019 RLANC Refined Project has been designed to improve the existing aesthetic character of the site by with the construction of three new facilities (SNF, RTP and RCC). The 2019 RLANC Refined Project would not displace or degrade the visual character of the RLANC and its surroundings but would instead contribute to a visual improvement. Therefore, compared with the Original Project and subsequent approved refinements, the proposed 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to aesthetics related to degradation of the existing visual character of the refined project site and its surroundings.

(d) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified less than significant impacts with mitigation with respect to light, glare and nighttime views. The 2019 RLANC Refined Project would not create a new or substantially more adverse significant impact to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect day or nighttime views in the refined project area from that disclosed in the RLANC FEIR. The 2019 RLANC Refined Project would affect the same area analyzed in the RLANC FEIR. Due to the existing high level of light

and glare in the vicinity of the RLANC and the complementary nature of the proposed building materials, new sources of light and glare resulting from implementation of the 2019 RLANC Refined Project would not be considered a substantial increase.

The RLANC is located in an urbanized area that currently experiences a high level of day and nighttime light and glare due to the high density of urban development. Current on-site sources of light and glare include the JPI Building and security and landscape lighting. Compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

B. AGRICULTURAL AND FOREST RESOURCES

The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to agricultural and forest resources compared to the RLANC FEIR was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to any of the following:		
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?		
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		
(d) Result in the loss of forest land or conversion of forest land to non-forest use?		
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified no impacts with respect to farmland and timberland. The RLANC is located in an urbanized area within the City of Downey. Although not subject to the requirements of Downey Vision 2025, the City of Downey designates the north campus of Rancho Los Amigos as a public land use, which is intended for areas to be occupied by public agencies as facilities that support community services, excluding schools and parks.³ This designation includes the Rancho Los Amigos Medical Center. There are no farmlands (including Williamson Act contracts) located in or immediately adjacent to the RLANC. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC

³ City of Downey Planning Department. Adopted 25 January 2005. Downey Vision 2025 General Plan. Available at: http://http://downeyca.org/depts/cd/planning/general_plan_n_map/default.asp.

Refined Project would not result in new or substantially more adverse significant impacts to agricultural and forest resources related to the conversion of Farmland.

Public Resources Code section 12220(g) defines forest land as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Public Resources Code section 4526 indicates,

“Timberland” means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.

Government Code section 51104 (g) indicates,

“Timberland production zone” or “TPZ” means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, “timberland preserve zone” means “timberland production zone.”

Sections 51112 and 51113 relate to timberland production within timberland production zones. Subdivision (h) indicates, a “compatible use” is any use which does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber” and provides six specific instances where such uses would be “contrary” or inconsistent with the land being considered a “compatible use.”

The RLANC is not zoned for forest land, timberland, or timberland production, nor is it adjacent to land zoned as such. Therefore, compared with the Original Project and subsequent refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to forest resources in relation to a conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

The entire RLANC is completely developed, landscaped, and built out with public institutional land uses. The surrounding areas are also developed, urban, and built out. Therefore, compared with the approved project, the refined project would not result in new or substantially more adverse significant impacts to agricultural and/or forest resources.

C. AIR QUALITY

Air quality impacts of the proposed 2019 RLANC Refined Project were evaluated with regard to the RLANC FEIR. The potential for the proposed 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to air quality than analyzed in the RLANC FEIR was evaluated in relation to five questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified a cumulatively considerable and therefore significant increase in air emissions during construction and operation; although project-only emissions were found to be less than significant. The 2019 RLANC Refined Project would not create a new or substantially more adverse significant impact to air quality related to conflicts with or obstruction of implementation of the applicable Air Quality Management Plan (AQMP).

The 2019 RLANC is a continuation of an existing use on an existing medical center campus and is consistent with growth assumptions contained in the 2016 RTP/SCS for the project area. Consistency with growth assumptions is one test for determining consistency with the AQMP. The other test is whether or not a project could cause violations of standards.

The RLANC is located within the South Coast Air Quality Management District (SCAQMD) portion of the South Coast Air Basin (SCAB). Ozone (O₃) is one of the pollutants of greatest concern throughout the SCAB. No single source accounts for most of the emissions of ozone precursors, nitrogen oxides (NO_x) and volatile organic compounds (VOCs); many sources are spread throughout the SCAB. Los Angeles County is designated as a federal-level nonattainment area for O₃, fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}) and lead. The SCAB is identified as "Maintenance" with respect to the National Ambient Air Quality Standards (NAAQS) for nitrogen dioxide (NO₂) and carbon monoxide (CO). The County is also a state-level nonattainment area for O₃, PM_{2.5}, and Particulate Matter with a diameter of less than 10 microns (PM₁₀) according to the California Ambient Air Quality Standards (CAAQS).

Existing air quality within the vicinity of the City of Downey is characterized by a mix of local emission sources that include stationary activities, such as space and water heating, landscape maintenance, and consumer products; and mobile sources, which primarily include automobile and truck traffic. Motor vehicles are the primary source of pollutants within the project vicinity but with improving vehicle emission controls CO hotspots are no longer a concern.

The Original Project consisted of 1,365,029 square feet of total building space (a net addition of 350,183 square feet of building area on the campus) and demolition of 356,000 square feet of buildings on the RLANC. The Original Project was determined to have significant impact on air quality. As identified in the RLANC FEIR, the Original Project was required to comply with a number of mitigation measures including the South Coast Air Quality Management District (SCAQMD) Rule 403, which was determined to reduce impacts from the demolition of structures to below the level of significance. Subsequent addendums reduced the total building space to 768,680 square feet (not including structured parking) and increased demolition to 521,000 square feet. The required mitigation measures would continue to reduce emissions as anticipated in the prior RLANC FEIR and two subsequent addendums. The 2019 RLANC now is proposed to include 785,170 square feet (exclusive of parking), representing a net reduction

in space on the campus of 229,676 square feet compared to what existed on the campus in 1992 and a reduction of 579,859 square feet as compared to what was contemplated in the RLAMC FEIR; no additional demolition is proposed as compared to that contemplated in prior addendums (521,000 square feet). Impacts (which are based on daily emissions from construction and operation) would be similar to those previously anticipated as similar numbers of pieces of construction equipment would be present on the campus each day and daily operations (primarily traffic) would be similar to those previously anticipated to occur on the RLAMC.

Compared with the approved project, the 2019 RLAMC Refined Project would not result in new or substantially more adverse significant impacts to air quality related to conflicts with or obstruction of implementation of the AQMP.

(b) Does the proposed 2019 RLAMC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the potential to violate any air quality standard or contribute substantially to existing or projected air violation?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified a cumulatively considerable and therefore significant increase in air emissions during construction and operation; although project-only emissions were found to be less than significant. The project analyzed in the RLAMC FEIR included 1,365,029 square feet of total building space (a net addition of 350,183 square feet of building area on the campus) and demolition of 361,000 square feet significant impacts on air quality related to motor vehicle and stationary source emissions. Direct and indirect impacts on air quality from the Original Project were determined to be mitigated to below the level of significance with mitigation measures. However, the Original Project was determined to contribute to significant cumulative impacts on air quality as result of increased vehicle trips and new stationary source emissions. This determination is conservative, since the SCAQMD thresholds are intended to be thresholds for both project specific impacts and considerable contribution towards a cumulative impact.

Subsequent addendums evaluated reductions in construction but increases in demolition and determined that the contribution of those refined projects (2013 and 2014) resulted in reduced emissions from that analyzed for the Original Project as a result of reducing total building space from 1,365,029 square feet to 768,680 square feet of space (exclusive of parking), and the corresponding reduction in vehicle miles travelled.

The 2019 RLAMC Refined Project would result in total building space at 785,170 square feet (exclusive of parking) and continues to provide for the previously anticipated demolition of up to 521,000 square feet buildings. Implementation of the required mitigation measures would continue to reduce direct and indirect impacts to below a level of significance. The 2019 RLAMC Refined Project would essentially replace 200 veteran housing units as well as 42 hospital beds that were never built that were included in the 2013 and 2014 RLAMC Refined Projects with 280 beds in the three proposed facilities: SNF, RTP and RCC. The building areas

involved would be similar; vehicle trips (and therefore associated emissions) would be less than anticipated for the Original Project, and less than existed on the site in 2013/2014. Building areas and the number of beds would be slightly more than was anticipated for the previously approved refined projects in 2013 and 2014 (see Table 5 above).

The 2019 RLANC Refined Project also maintains the reduction to cumulative impacts to air quality that were achieved previously through the reduction in occupied building space. As such, there would be no changes in impacts to air quality as a result of the 2019 RLANC Refined Project. Therefore, compared with the approved project, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to air quality related to a violation of any air quality standard or substantial contribution to existing or projected air violation.

(c) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As discussed above, project emissions (construction and operation) were previously evaluated to be below the SCAQMD thresholds with mitigation. Since these thresholds are for both 1) project-specific and 2) considerable contribution towards cumulative, emissions would be considered less than significant. However, the RLAMC FEIR conservatively identified the contribution towards cumulative impacts as significant. Compared to the previously analyzed RLANC Refined Projects (2013 and 2014) the 2019 RLANC Refined Project would result in similar developed space on the campus (see discussion above) resulting in similar contribution to cumulative impacts (which was substantially less than the Original Project). As such, there would be no changes in impacts to air quality as a result of the proposed 2019 RLANC Refined Project. Therefore, compared with the Original Project and previously evaluated RLANC refined projects, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to air quality related to criteria pollutants.

(d) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The nearest sensitive receptors, single-family residences, are located more than 100 feet from the construction area. As with the previously analyzed Refined Projects (2013 and 2014),

required mitigation measures would reduce impacts to sensitive receptors to below the level of significance.

As with the 2014 Refined Project and as discussed above, total building space would be reduced compared to the Original Project (demolition would be as previously analyzed in the 2014 Addendum). Therefore, emissions would be similar to those anticipated to occur with the 2014 Refined Project.

As such, the 2019 RLANC Refined Project would not change construction or operation emissions as compared with the Original Project and previously evaluated RLANC refined projects. Therefore, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to air quality or sensitive receptors related to criteria pollutants.

(e) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to creating objectionable odors affecting a substantial number of people?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The 2019 RLANC Refined Project would not include additional construction or create additional odors beyond that anticipated for the Original Project and previously evaluated RLANC refined projects. Therefore, the 2019 RLANC Refined Project would not result in new or substantially more significant impacts to air quality related to objectionable odors.

D. BIOLOGICAL RESOURCES

The Initial Study prepared in connection with the RLAMC FEIR determined that the Original Project would not result in significant impacts to biological resources; therefore, this environmental issue area was not carried forward for analysis in the EIR. Biological resources were reevaluated in Addendum No. 1 to the RLAMC FEIR, and the “no impact” determination was reaffirmed for the 2013 Refined Project.

Biological resources were reevaluated for the 2014 Refined Project and found to result in no impact. The potential for the proposed 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to biological resources than analyzed in the RLAMC FEIR was evaluated in relation to six questions recommended for consideration by the State California Environmental Quality Act Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?
- (b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- (c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- (d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC continues to be completely developed with buildings, parking areas, hardscape, and landscape and provides no suitable habitat for species identified as candidate, sensitive, or special status. Therefore, as with the Original Project and previously evaluated RLANC refined projects, the 2019 RLANC Refined Project would not result in an adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW and USFWS.

There are no blue-line drainages or wetlands identified in the National Wetlands Inventory within the RLANC. There is no designated or proposed critical habitat for species listed as rare, threatened, or endangered pursuant to the Federal or State Endangered Species Act. The RLANC does not include any wetlands, riparian habitat or other sensitive natural community or designated critical habitat identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Therefore, as with the Original Project and previously evaluated RLANC refined projects, the 2019 RLANC Refined Project would not result in a potential adverse effect on wetlands, riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW and USFWS.

The RLANC does not provide for wildlife corridors, species movement, or nursery sites. Therefore, as with the as with the Original Project and previously evaluated RLANC refined projects, the 2019 RLANC Refined Project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native or migratory wildlife corridors or impede the use of native wildlife nursery sites.

(e) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC is completely developed with buildings, parking areas, hardscape, and landscape, and does not include any resources protected by local policies or ordinances for protecting biological resources. While there are numerous trees located on the RLANC, none of the trees are protected by local policy or ordinance. The 2019 RLANC would not result in the removal of any additional trees beyond that contemplated by previously evaluated refined projects. Any trees removed would be replaced at a ratio of 1:1 in accordance with LA County Department of Public Works policy. Consequently, the 2019 RLANC Refined Project would not result in new or substantially more significant impacts with respect to a conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

(f) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As indicated in the RLAMC FEIR, the CDFW's National Community Conservation Planning (NCCP) program, the only NCCP region within the County is the Palos Verdes Peninsula NCCP. There are no proposed or adopted NCCPs or Habitat Conservation Plans (HCPs) that apply to the RLANC or adjacent areas. The 2019 RLANC Refined Project would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

E. CULTURAL RESOURCES

As a result of the analysis undertaken in the Initial Study prepared in connection with the RLAMC FEIR, it was determined that the Original Project would not result in significant impacts to cultural resources; therefore, this environmental issue area was not carried forward for analysis in the RLAMC FEIR. Cultural resources were re-evaluated in Addendums No. 1 and 2 to the RLAMC FEIR (2013 and 2014), and the "no impact" determination was reaffirmed.

The potential for the proposed 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the RLAMC FEIR and four questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The County completed an inventory of all the structures on Rancho Los Amigos subsequent to the FEIR, which resulted in a determination that the Harriman Building was the only historical resource on the RLANC. Primary construction on the RLANC generally occurred in the 1960s and 1970s, and other than the Harriman Building (Building 400, LACO No. 1180), none of the buildings has been found to be of historical significance. The facade of the Harriman Building was determined to be a significant historical resource; rehabilitation of that building is to begin mid-2019. The 2019 RLANC does not propose any additional demolition of buildings beyond that previously approved. Therefore, the 2019 RLANC Refined Project would not result in new or substantially more significant impacts to historical resources.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(b) Would the proposed RLANC Refined Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		
(c) Would the proposed RLANC Refined Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		
(d) Would the proposed RLANC Refined Project disturb any human remains, including those interred outside of formal cemeteries?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC has been substantially disturbed by existing development, likely down to at least five feet. The project site has not been surveyed for archaeological or paleontological resources.

Impacts to paleontological resources normally occur when a project involves excavation or demolition of buildings requiring disturbance of underlying sedimentary rock or undisturbed consolidated soil. Disturbance of underlying sedimentary rock or undisturbed consolidated soils that have a moderate to high potential to contain unique paleontological resources has the potential to result in the loss of scientific information. The RLANC is underlain by surficial deposits of younger Quaternary alluvium (Pleistocene and Holocene) as a result of deposition from the Los Angeles River, which currently flows through a concrete channel just west of the RLANC. These younger Quaternary deposits do not usually contain significant fossil vertebrates in the uppermost layers. The closest known fossil locality, identified as LACM 3382, is situated southwest of the RLANC, west of Interstate 710 (Long Beach Freeway), east of Wilmington Avenue, and north of Artesia Boulevard. This locality produced a specimen of fossil mammoth,

Mammuthus, at a depth of 5 feet below the surface. Surface grading or very shallow excavations within the RLANC are unlikely to uncover significant fossil vertebrates. However, based on the previous fossil findings deeper excavations extending down into older Quaternary alluvium could encounter significant fossil vertebrate remains.

The County would continue to follow standard procedures in the event of an accidental discovery of archaeological and/or paleontological resources during construction, including stoppage of work on the site of the discovery, immediate evaluation of the find by a qualified archaeologist and/or paleontologist (as appropriate), and, if warranted, excavation and recovery of significant archaeological and/or paleontological resource(s).

The 2019 RLANC does not include any project components that would result in greater impacts to archaeological resources than could have occurred under the Original Project or previous refined RLANC projects.

Therefore, compared with the Original Project and previous refined RLANC projects, the 2019 RLANC Refined Project would not result in new significant impacts or substantially more adverse significant impacts related to a substantial adverse change in the significance of an archaeological and/or paleontological resource.

As with the Original Project, in accordance with California Health and Safety Code Sections 7050 and 7052, in the event of the discovery of human remains outside of a dedicated cemetery, all ground disturbance would cease, and the County of Los Angeles Coroner would be notified. Furthermore, in accordance with Public Resources Code Section 5097.98, the NAHC would be notified in the event that the County Coroner determines that the remains are Native American. Therefore, compared with the original and previously analyzed refined projects, the 2019 RLANC would not result in new significant impacts or substantially more adverse significant impacts with respect to human remains.

F. GEOLOGY AND SOILS

Impacts to geology and soils of the 2019 RLANC Refined Project were evaluated with regard to the RLANC FEIR including adopted mitigation measures. The potential for the proposed RLANC Refined Project to result in new or substantially more adverse significant impacts to geology and soils was evaluated in relation to eight questions recommended for consideration by the State CEQA Guidelines.

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

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?
 - iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?
- (b) Result in substantial soil erosion or the loss of topsoil?
- (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed ordinance, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- (d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- (e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant with mitigation impacts with respect to seismic risk, soil erosion, and unstable or expansive soils. The RLANC is not located within an Alquist-Priolo Earthquake Fault Zone, and no known active faults are known to exist on the RLANC. The RLANC is located 6.7 miles northeast of the Newport-Inglewood fault. The Avalon-Compton fault lies within the central portion of the Newport-Inglewood fault zone are located approximately 2.5 miles from the RLANC.

Liquefaction potential is greatest in saturated, loose, and poorly graded sand. Based on previous investigations, the subsurface material is classified as bedrock. The potential for soil liquefaction and other secondary seismic hazards, such as lurch cracks and seismically induced settlement was determined to be less than significant in the RLAMC FEIR and prior addendums.

The topography of the RLANC is relatively flat terrain, with shallow downward slopes in a westerly direction. There are no areas susceptible to seismic-induced landslides in the project vicinity. Landslides are not considered to be a potential hazard at the RLANC.

Areas susceptible to erosion typically include steeper slopes and are located along drainage courses. Due to the relatively flat terrain of RLANC, significant site erosion would not be anticipated. The largest threat of erosion is from uncontrolled drainage, especially during construction. As evaluated for the Original Project and subsequent approved refinements, project components could be susceptible to erosion during site grading, earthmoving, and construction activities. The RLAMC FEIR requires mitigation including on-site storm drain

facilities to adequately transport stormwater runoff to existing County storm drain facilities on Imperial Highway and Old River School Road.

The potential for expansion of near-surface soils was previously determined to be low at the RLANC.

The 2019 RLANC Refined Project would continue to be required to be constructed in accordance with applicable state requirements, including the Uniform Building Code seismic safety requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from seismic hazards.

Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC would not result in new or substantially more adverse significant impacts related to exposing people or structures to potential substantial adverse effects involving the rupture of a known earthquake fault, substantial effects as a result of strong ground shaking, liquefaction, landslides, erosion, and/or expansive soils.

As with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would be connected to the municipal sewer system, and thus would not necessitate the use of septic tanks or alternative waste water disposal systems.

G. GREENHOUSE GAS EMISSIONS

The impacts of greenhouse gas (GHG) emissions on global climate change were not yet recognized by the State of California at the time of the certification of the RLAMC FEIR, and therefore were not included in the analysis of impacts. However, energy consumption (the primary source of GHG emissions) and conservation and measures to reduce energy consumption were evaluated in the RLAMC FEIR. Addendums No. 1 and 2 to the RLAMC FEIR specifically assessed the potential impacts of GHG emissions and found them to be less than significant.

GHG emissions associated with the proposed 2019 RLANC Refined Project were evaluated based on a review of the RLAMC FEIR and subsequent addendums and the required mitigation measures. The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts from the Original Project related to greenhouse gas emissions was evaluated in relation to two questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment		
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Compared to the 2014 Refined Project the 2019 RLANC Refined Project would result in similar amounts of demolition, construction and occupiable building areas as well as parking. The RLANC would not result in new or substantially more adverse significant impacts to greenhouse gas (GHG) emissions in relation to generating GHG emissions, either directly or indirectly. The RLANC Project now includes a feature designed to enhance transit access to the site (the continuation of Leeds Street through the campus). This feature would make it easier for Metro to access the site and therefore would enhance transit ridership – especially for employees. There is also a Metro transit station (Gardendale station) for the West Santa Ana Branch light rail line that is proposed by Los Angeles County Metropolitan Transportation Authority as lead agency, approximately ½ mile from the RLANC. If approved, the Gardendale station would be operational in 2028. It would improve access to the site and enhance transit ridership. The reduced size of the project compared to the Original Project would result in reduced GHG emissions as a result of energy consumption.

In 2015, the City of Downey prepared and implemented an Energy Action Plan (EAP) that is designed to reduce energy consumption and associated GHG emissions. Goals of the EAP are as follows;

- Meet and exceed AB 32 energy reduction goals
- Enhance energy efficiency and operations in existing buildings through systematic commissioning strategies or independent energy efficiency studies
- Evaluate all suggested energy efficiency action measures presented in this EAP, establish a priority for implementation, and determine possible funding sources
- Explore the newest "green" technologies and methods to decrease future energy dependency
- Explore renewable energy recourses (not limited to solar) and possible financing based on available grants/rebates
- Continue interacting, educating, and informing the community about energy efficiency and greenhouse gas emissions
- Be an example for energy efficiency and sustainability at City facilities

In addition, the City of Downey is a member of the gateway Cities Council of Governments (COG). In 2017 the Gateway Cities (COG) received grant funds to prepare a regional Climate Action Planning Framework that local jurisdictions can use to develop a voluntary Climate Action Plan for reducing greenhouse gas emissions in their communities. The CAP Framework is intended to help individual communities advance their goals for economic development,

public health, air quality, climate resiliency, equity, and job creation while planning for the impacts of climate change

While the RLANC Project is not subject to City of Downey regulations, the project includes a number of measures to reduce energy consumption and would not conflict with any of the goals of the Downey EAP or Climate Action Framework. The RLANC Project is a regional facility that consolidates and centralizes healthcare facilities in an energy-efficient manner that results in reduced GHGs from County facilities. The previously identified mitigation measures to reduce energy consumption would also reduce GHG emissions; and the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts with respect to GHG emissions as compared to the Original Project and subsequent approved refinements evaluated in prior addendums.

H. HAZARDS AND HAZARDOUS MATERIALS

Hazards and hazardous materials of the proposed 2019 RLANC Refined Project were evaluated based on a review of the studies included in the RLAMC FEIR and subsequent addendums and impacts were evaluated compared to impacts identified in the RLAMC FEIR, subsequent addendums and the required mitigation measures. Hazardous waste can pose a potential or substantial hazard to human health or the environment when improperly managed. Designated hazardous waste possesses at least one of four defined characteristics—ignitability, corrosivity, reactivity, or toxicity—or appears on special U.S. Environmental Protection Agency lists. The potential for the proposed RLANC Refined Project to result in new or substantially more adverse significant impacts related to hazards and hazardous materials was evaluated in relation to eight questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant impacts with mitigation respect hazards and hazardous materials. The RLAMC FEIR identified the potential presence of hazardous materials in three areas on the RLANC: (1) refrigeration plant and cooling towers; (2) five underground storage tanks installed prior to 1987, and (3) reserve diesel generators and asbestos in Buildings 500, 600, 700, 800, and 900. The RLAMC FEIR identified mitigation measures to ensure the correct characterization, abatement, and disposal of hazardous material

from these three potential sources and therefore identified a less than significant impact after mitigation.

The nearest school, Old River Elementary School is located at 11995 Old River School Road approximately 0.4 mile north of the RLANC. Therefore, the 2019 Refined Project would not result in new or substantially more adverse impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The RLANC site has a completed, case closed Leaking Underground Storage Tank (LUST) Cleanup as well as a permitted underground storage tank.⁴

The 2019 RLANC Refined Project contemplates no additional activities with respect to the three potential sources of contamination. Therefore, the previously identified mitigation measures would continue to ensure that impacts remain below a level of significance and the 2019 RLANC Refined project would not result in new or substantially more adverse significant impacts with respect to hazardous materials as compared to the Original Project and subsequent approved refinements evaluated in prior addendums.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (e) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- (f) Be located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified no impacts with respect to being located in proximity to an airport, airstrip, interference with an emergency response plan and risk associated with wildfires. The RLANC is not located within an airport land use plan or within 2 miles of a public airport or private air strip. The nearest public airports are the Compton/Woodley Airport located approximately 5.3 miles to the southwest and the Long Beach Municipal Airport located approximately 7.1 miles to the south-southwest of the RLANC. The nearest active private airstrip is Jack Northrop Field/Hawthorne Municipal Airport, approximately 9.6 miles west of the RLANC.

Therefore, the 2019 Refined Project would not result in new or substantially more adverse impacts related to being located within 2 miles of a public or public use airport or private airstrip.

⁴ Geotracker web site: <https://geotracker.waterboards.ca.gov>, accessed March 12, 2019

The 2019 Refined Project elements would not be designated as an emergency staging area and would not contain elements that would interfere with local emergency response or evacuation routes. The 2019 Refined Project would not physically impede existing emergency response plans, emergency vehicle access, or personnel access. Therefore, compared with the Original Project and subsequent refined projects, the 2019 Refined Project would not result in new or substantially more adverse significant impacts related to an adopted emergency response plan or emergency evacuation plan.

The RLANC is in an entirely urbanized area and is not adjacent to wildlands. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

I. HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the proposed 2019 RLANC Refined Project were evaluated in relation to the RLAMC FEIR and required mitigation measures. The potential for the proposed RLANC Refined Project to result in new or substantially more adverse significant impacts related to hydrology and water quality was evaluated in relation to 10 questions recommended for consideration by the State CEQA Guidelines.

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

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Violate any water quality standards or waste discharge requirements?		
(b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant impacts with respect to water quality and groundwater. As with the 2014 Refined Project, the 2019 RLANC Refined Project would continue to reduce the total development on the RLANC. The 2014 Refined Project included the demolition of Buildings 500, 600, 700, 800, and 900. The 2019 RLANC would continue to consolidate building functions and increase permeable areas to the extent feasible.

All construction activities would be required to comply with LA County Low Impact Development requirements and to implement best management practices (BMPs) to reduce or eliminate non-storm discharges to the storm water system. Implementation of BMPs would result in meeting the water quality standards set forth by responsible agencies, and would address storm runoff quantity and flow rate, suspended solids (primarily from erosion), and contaminants such as phosphorus and hydrocarbons. BMPs would be incorporated in accordance with the NPDES permit issued to the County by the LA-RWQCB, the County Storm Water Management, and the County General Plan.

Water demand is calculated based on building area or beds (or a combination). The 2019 RLANC Refined Project would result in less occupied space and fewer beds/occupants as compared to the Original Project and slightly more occupied space and beds as compared to the 2013 and 2014 Refined Projects. It would therefore result in less demand for water as compared to the Original Project and slightly greater demand for water as compared to the 2013 and 2014 Refined Projects. The 2019 RLANC Refined Project would result in less impervious surfaces than previously analyzed.

The 2019 RLANC Refined Project would continue to be required to implement a Storm Water Pollution Prevention Plan during construction to avoid impacts on storm water runoff as well as a Standard Urban Storm Water Management Plan to support the operational phase of the RLANC. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to water quality standards, waste discharge requirements and/or depletion of groundwater or interference with groundwater recharge.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- (d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- (e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- (f) Otherwise substantially degrade water quality?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant impacts with respect to altering drainage patterns and exceeding runoff capacity. There are no streams or rivers located on the RLANC. Therefore, there would be no alteration to the course of a stream or a river. The County would continue to ensure that the 2019 RLANC Refined Project would not result in a net increase in storm water runoff; therefore, there would be no change in existing drainage pattern from implementation of the 2019 RLANC Refined Project. As with the Original Project and subsequent refined projects, the areas where buildings would be demolished would be rough

graded to maintain the existing drainage pattern on the site and hardscaped or landscaped to prevent erosion. As discussed above, best management practices (BMPs) through the design and implementation of the Standard Urban Storm Water Management Plan, would be implemented consistent with the requirements of the applicable NPDES permit. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on site or off site.

The nearest river is the Los Angeles River located approximately 0.5 mile to the west. The RLANC FEIR requires that the storm drain facilities on the RLANC be upgraded to adequately transport storm water runoff to existing County storm drainage facilities on Imperial Highway and Old River School Road.

The quality of storm water runoff is regulated under the NPDES storm water permit issued to the County, which provides a mechanism for establishing appropriate controls and monitoring for the discharge of pollutants to the storm water runoff system. The County requires all development projects within its jurisdiction to comply with the NPDES requirements for construction and operations, as appropriate, and to design and implement a Standard Urban Storm Water Management Plan in a manner that is consistent with the requirements of the applicable NPDES permit.

The 2013 and 2014 Refined Projects as well as the proposed 2019 RLANC Refined Project could increase the total area of retained pervious surface. Therefore, with mitigation, compared to the Original Project, as well as the 2013 and 2014 refinements, the proposed 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to the alteration of existing drainage patterns of the RLANC or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site or exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted water or otherwise substantially degrade water quality.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?		
(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		
(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		
(j) Inundation by seiche, tsunami, or mudflow?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified no impacts with respect to flood risk. As indicated in the RLANC FEIR, the majority of the RLANC is located outside of the 100-year flood zone; however, approximately 10 percent of the RLANC (the portion of the site adjacent to Old River School Road) is located within the 100-year flood zone. Since the certification of the RLANC FEIR,

flood improvements have been made at the intersection of Quill Drive and Rives Avenue and within the RLANC; therefore, this area is currently capable of providing a 100-year or greater level of flood protection as required by FEMA.

The 2019 RLANC Refined Project would be constructed in accordance with applicable state requirements, including the Uniform Building Code flood zone requirements. Compliance with existing standards and requirements would ensure an adequate level of protection from flood hazards.

The RLANC is not located within a steep or hilly area that would be susceptible to mudslides or landslides. Mudslides and landslides are not considered to be a potential hazard at the RLANC. Similarly, the RLANC is not located near coastlines, lakes, and/or flood control basins or adjacent to any steep-sided slopes covered with soils and/or vegetation. Thus, there is no potential for impacts in relation to the inundation by seiche, tsunami, or mudflow.

The 2019 RLANC Refined Project does not include the construction of housing or result in the redirection of flood flows toward residential areas. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to placement of housing within a 100-year flood hazard area or placement of structures that could impede or redirect flood flows. The RLANC Refined project would similarly not result in new or substantially more adverse significant impacts related to exposure of people or structures to a significant risk of loss, injury or death involving flooding or inundation by seiche, tsunami or mudflow.

J. LAND USE AND PLANNING

Land use and planning impacts of the 2019 RLANC Refined Project were evaluated in light of the RLAMC FEIR. The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts related to land use and planning compared to the approved project was evaluated in relation to three questions recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an existing community?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified less than significant impacts with respect to land use. The 2019 RLANC Refined Project is a continuation of an existing use on an existing medical center campus. The 2019 RLANC Refined Project continues the medical use with programs that would be complementary to the existing hospital. The 2019 RLANC Refined Project would not impact any other parcels and would not create a temporary barrier in the neighborhood. Similarly, the 2019 RLANC Refined Project would not create a permanent division that would divide an established community, as the RLANC would continue to function as a medical facility. The RLAMC FEIR indicates that consolidation of medical uses on the RLANC could contribute to cumulative impacts in the area with respect to conversion of the area from low- intensity land

uses to higher intensity land uses. The RLANC FEIR requires the retention of existing landscaping around the perimeter of the site, generally on the north and east perimeters. The intent of the mitigation measure is to act as a buffer between the adjacent single-family residential neighborhood and the new medical buildings. As with the 2013 and 2014 Project Refinements, the 2019 Refined Project would continue to reduce total building space on the RLANC as compared to what was analyzed in RLANC FEIR (the 2019 Refined Project would result in occupiable building space that would be about 42.5% less than analyzed in the RLANC FEIR). Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not result in new or substantially more adverse significant impacts related to physical division of an established community.

(b) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identified less than significant impacts with respect to consistency with applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. The RLANC is built out and used exclusively for hospital and medical-related purposes. As with the Original Project and 2013 and 2014 Project Refinements, the 2019 RLANC Proposed Project would result in redevelopment of the existing medical campus with complementary medical-related uses, consistent with the goals and objectives of the Original Project and subsequent approved refinements. The RLANC is located in the City of Downey but is owned and operated by the County of Los Angeles and is therefore subject to the regulations of the County and City land use controls are not applicable.

The Downey Vision 2025 General Plan designates the RLANC as Public, which is intended for areas to be occupied by public agencies as facilities that support community services, excluding schools and parks. This designation includes the Rancho Los Amigos Medical Center. The 2019 RLANC Refined Project would be developed with medical buildings consistent with the “public and semi-public facilities” land use designation. Because the RLANC Refined Project is located within the physical boundaries of the City of Downey, prior to the start of construction, the County will notify the City of Downey of the proposed refinements, in accordance with, and subject to, California Government Code Section 65402(b). The City zoning designation for the RLANC is Residential, R-1-5,000. The R-1- 5,000 zone is a single-family residential zone requiring a 5,000-square-foot-minimum lot size. The 2019 Refined Project would be consistent with applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to a conflict with adopted or proposed land use plans, policies, or regulations.

(c) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR concludes no impact with respect to conflicts with habitat conservation planning. The project site is located in a densely populated urban setting and no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan are applicable to the project area. Consequently, the proposed 2019 RLANC Refined Project would not have an impact on any such plans. Therefore, the RLANC Refined project would not result in new or substantially more adverse significant impacts related to a conflict with any adopted Habitat Conservation Plan or Natural Community Conservation Plan.

K. MINERAL RESOURCES

The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to mineral resources was evaluated in relation to the RLAMC FEIR and two questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identified no impacts with respect to mineral resources. Los Angeles County contains active sand and gravel, dimension stone, clay, decorative rock, and tungsten producers. However, there are no mining districts located in or around the RLANC. In addition, the project area is urban in nature and mining activities would be incompatible with such uses. Compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to the loss of availability of a known mineral resource or known locally important mineral resource recovery site.

L. NOISE

The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the RLANC FEIR and six questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		
(b) Exposure of persons to or generation of excessive groundborne vibration or noise levels?		
(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		
(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Construction

The RLANC FEIR identifies significant impacts with respect to construction noise. The Original Project and subsequently approved refinements identified the potential to create noise in excess of established standards during construction. The RLANC FEIR identifies mitigation measures to address noise levels. The highest noise impacts are expected to be caused during excavation at 89 dBA (an "A" weighted measurement for sound) at 50 feet which would be 83 dBA at 100 feet from the construction area. The nearest sensitive receptors to the RLANC are residential land use to the north. As with the Original Project and subsequent approved refinements, all construction activities for the 2019 RLANC Refined project are located more than 100 feet away from residential land uses. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not be expected to create a new or significantly more adverse impact on ambient noise levels from those identified in the RLANC FEIR. In addition, the residential uses to the north are now separated from construction activities by a Concrete Masonry Unit (CMU) wall covered with landscaped plants that was one of the required mitigation measures from the RLANC FEIR. This noise wall would reduce line-of-sight noise levels by 10 dBA to 15 dBA, potentially reducing construction noise levels below a level of significance.

The RLANC FEIR indicates that vibration from construction activities (pile driving, large bull dozers and loaded trucks) would be perceptible in adjacent residences but that because construction activities would be limited to daytime hours and activities would be infrequent, vibration perception impacts from construction are considered less than significant. No additional mitigation would be required and there would be no new or greater impacts than those identified in the certified RLANC FEIR. The RLANC FEIR found that construction activities, with mitigation, would result in less than significant vibration impacts. No pile driving is proposed as part of the 2019 RLANC Refined Project.

Operation

Potential impacts resulting from operation of the 2019 RLANC Refined Project would be less than impacts that would have occurred with the Original Project and similar to impacts that would have occurred with the subsequent approved refinements. Outdoor activities would include people recreating in outdoor landscaped areas as well as noises associated with parking cars. Operational noise for similar medical uses is less than 50 dBA at 50 feet (typically associated with operation of rooftop equipment including Heating Ventilation and Air Conditioning – HVAC -- and fans and vehicles arriving and departing as well as people talking in outside areas). The RLANC requires mitigation measures for mechanical equipment. The nearest sensitive receptors (single-family residences) are more than 100 feet from buildings. The maximum permitted noise level at a residential location during operation is 45 dBA. Taking into consideration the distance from potential noise sources to receptors, the noise levels at receptors would be less than 45 dBA. In addition, traffic noise levels would be reduced to below the levels evaluated in the RLANC FEIR due to the reduction in the number vehicle trips (the 2019 RLANC Refined Project would generate less trips than existed on the site at the time the RLANC FEIR was prepared, less than would have occurred with the Original Project, less than were associated with operations at the time the 2013 and 2014 Addendums were prepared and slightly more than the 2013 and 2014 Refined Projects).

As with the Original Project and subsequent approved refinements (2013 and 2014), there would be no vibration impacts associated with operation of the RLANC Refined Project.

Summary

Therefore, as compared with the Original Project, the 2019 RLANC Refined Project with implementation of all required mitigation measures would not result in new or substantially more adverse significant impacts related to exposure or generation of noise levels in excess of established standards and/or vibration impacts.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?		
(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies no impacts with respect to proximity to an airport or airstrip. The nearest public airports are the Compton/Woodley Airport located approximately 5.3 miles to the southwest and the Long Beach Municipal Airport located approximately 7.1 miles to the south-southwest of the RLANC. The nearest active private airstrip is Jack Northrop Field / Hawthorne Municipal Airport, approximately 9.6 miles west of the RLANC. As with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not be expected to

result in new or substantially more adverse significant impacts related to public airports or private airstrips.

M. POPULATION AND HOUSING

Population and housing impacts of the project were evaluated with regard to the RLAMC FEIR. The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant was evaluated in relation to three questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?		
(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?		
(c) Displace substantial numbers of people, necessitating the construction of replacement housing?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identifies a cumulatively considerable contribution to impacts with respect to job creation and housing demand. The 2019 RLANC Refined Project would result in less total development on the site as compared to the Original Project (785,170 square feet of occupiable space and 438 beds as compared to 1,365,029 and 600 beds) which would result in less employment than anticipated in the RLAMC FEIR. The Rancho Los Amigos Medical Center is an existing use that is consistent with existing zoning and therefore consistent with SCAG growth projections for the area. No housing or people would be displaced at the RLANC as a result of the project (original, subsequent approved refinements nor 2019 RLANC Project refinements).

The RLAMC FEIR indicated that the Original Project could contribute to a cumulative impact related to jobs housing imbalance in the sub region (by creating jobs and therefore a potential need for housing). The mitigation measures identified in the RLAMC FEIR required that the project provide convenient access to transit and implementation of a Transportation Demand Management (TDM) program, including encouraging employers to provide carpool, vanpool, or transit use incentives to reduce project traffic. These mitigation measures would continue to apply, although the jobs housing balance impact is no longer considered significant. By providing direct access to buses through the site (and access to the planned Metro light rail lines at the proposed Gardendale station), the County is facilitating transit access.

Compared with the Original Project, the 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts related to population growth (or the displacement of housing or people).

N. PUBLIC SERVICES

Public Services impacts of the proposed 2019 RLANC Refined Project were evaluated based on a review of the RLANC FEIR. The potential for the proposed RLANC Refined Project to result in new or substantially more adverse significant impacts to public services was evaluated in relation to one question (relevant to each public service) recommended for consideration by the State CEQA Guidelines.

(a) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services listed below.		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

i) Fire

The RLANC FEIR identifies less than significant impacts with mitigation with respect to fire protection. The RLANC is located in the City of Downey and is served by the Downey Fire Department (DFD), which maintains four fire stations throughout the City: Fire Station No. 1 (1.4 miles from the RLANC), Fire Station No. 2 (2.6 miles from the RLANC), Fire Station No. 3 (3.5 miles from the RLANC), and Fire Station No. 4 (4.7 miles from the RLANC). These stations house four Engine Companies, one Truck Company, two Paramedic Squads, two Basic Life Support (BLS) Ambulances, one Urban Search & Rescue (USAR) Unit, and one Command Vehicle. In 2016, the Downey Fire Department responded to a total of 11,300 emergency incidents.

The Original Project included a total occupiable building area of 1,365,029 square feet and demolition of 361,000 square feet of buildings on the RLANC. The Original Project was determined to have significant impact on fire protection services that required mitigation measures. The RLANC FEIR identified a number of mitigation measures for fire protection services including installation of an underground looped dedicated fire suppression water distribution system connected to each building and sprinklers in new and older buildings. Implementation of the required mitigation measure was determined to reduce impacts to below a level of significance.

The subsequently approved refined projects reduced occupiable building area to 768,680 square feet and increased demolition to 521,000 square feet; the proposed 2019 RLANC Refined Project results in a similar amount of occupied space (785,170 square feet). This reduced occupiable building area would result in reducing the level of impact on fire suppression and protective services. Implementation of the mitigation measures identified in the RLANC FEIR would still be required, thus further reducing impacts and maintaining impacts below a level of significance. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not be expected to result in new or substantially more adverse significant impacts related to fire protection.

ii) Police protection

The RLAMC FEIR identifies less than significant impacts with mitigation with respect to police protection. Police protection to the RLANC is provided by the Los Angeles County Sheriff's Department (LASD), which provides Rancho with on-site professional police and security services, including foot and vehicle patrols. In addition to site patrols, the LASD enforces the California penal codes, federal and state laws, and County ordinances, and assists in attaining compliance with hospital policies, while contract security monitors the entrances to Rancho, checks workforce member badges, monitors visitor check-in, conducts exterior foot patrol, and observes/reports any suspicious activities to the LASD. County security personnel would continue to monitor and patrol the site. Police protection to the proposed SNF, RTP and RCC would be provided by either LASD or the Downey Police Department.

The Original Project included 1,365,029 square feet of total building space and demolition of 361,000 square feet existing buildings on the RLANC. The subsequently approved refinements reduced occupiable building area to 768,680 square feet and increased demolition to 521,000 square feet; the proposed 2019 RLANC Refined Project results in a similar amount of occupied space to previous refinements (785,170 square feet) and would not change demolition. The 2019 RLANC Refined Project would not require additional police personnel or construction of new police protection facilities beyond what would have been required for the Original Project and subsequent approved refinements. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not be expected to result in new or substantially more adverse significant impacts related to police protection.

iii) Schools

The RLAMC FEIR identifies less than significant impacts with respect to schools. The Downey Unified School District (DUSD) serves the City and operates 13 elementary schools, four middle schools, and three high schools. The Original Project included 1,365,029 square feet of total building space and demolition of 361,000 square feet existing buildings on the RLANC. The subsequently approved refinements reduced occupiable building area to 768,680 square feet and increased demolition to 521,000 square feet; the proposed 2019 RLANC Refined Project results in a similar amount of occupied space to previous refinements (785,170 square feet) and would not change demolition. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 Refined Project would not be expected to result in new or substantially more adverse significant impacts related to schools.

iv) Parks

The RLAMC FEIR identifies less than significant impacts with respect to parks. The number of parks in the City of Downey has substantially increased since the RLAMC FEIR was certified and, consequently, the potential for impact has decreased. The parks and recreational facilities located within an approximate 1-mile radius of the RLANC include Apollo Park, Hollydale Park, Brookshire Children's Park, All American Park, and the Los Amigos Golf Course.

The Original Project included 1,365,029 square feet of total building space and demolition of 361,000 square feet existing buildings on the RLANC. The subsequently approved refinements reduced occupiable building area to 768,680 square feet and increased demolition to 521,000 square feet; the proposed 2019 RLANC Refined Project results in a similar amount of occupied space to previous refinements (785,170 square feet) and would not change demolition.

The 2019 RLANC Refined Project would not be expected to increase the demand on existing park facilities in the City. Furthermore, the Rancho Los Amigos Medical Center would have reduced impacts on existing neighborhood recreational facilities because the new facilities include gym and aquatic facilities. The therapeutic pool redirects the aquatic physical therapy program from the local YMCA recreational facility. Patients and staff of the proposed SNF, RTP and RCC would not be expected to make substantial use of off-campus park facilities. Therefore, compared with the Original Project, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to parks.

v) Other public facilities

The RLANC FEIR identifies less than significant impacts with respect to other public facilities. The RLANC is adequately served by public facilities, including a United States Post Office located at 7911 East Imperial Highway approximately 0.2 mile to the southeast, and the Downey City Library located at 11121 Brookshire Avenue approximately 1.6 mile to the northeast. The number of users of public services and other facilities, including libraries, energy, natural gas, communications systems, water service, sanitary sewers, solid and waste processing facilities, would be less than would have occurred under the Original Project and similar to that anticipated for subsequent approved refinements. Therefore, compared with the Original Project, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to construction of other public facilities that would have the potential to result in physical alterations to the environment.

O. RECREATION

The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to recreation was evaluated in relation to the RLANC FEIR and two questions recommended for consideration by the State CEQA Guidelines.

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

The RLANC FEIR identifies less than significant impacts with respect to recreation. As noted above, the number of parks in the City of Downey (City) has substantially increased since the RLANC FEIR was certified, and the potential for impacts has consequently decreased. Apollo Park is a recreational facility adjacent to the RLANC. Hollydale Park, All American Park, Brookshire Children's Park, and Los Amigos Golf Course are recreational facilities that are located approximately within a 1-mile radius of the RLANC. These parks and facilities serve the recreational needs of the surrounding community.

As discussed above, development of the campus is consistent with growth projections for the project area. The 2019 RLANC Refined project would not be expected to induce substantial growth or concentration of population beyond the City's regional projections. In addition, the Rancho Los Amigos Campus now contains gym and aquatic facilities and staff and patients at the Rancho facility are not expected to make substantial use of off-campus recreational facilities. Therefore, no individual park or recreation facilities would be expected to experience physical deterioration as a result of implementation of the 2019 RLANC Refined Project.

The 2019 RLANC Refined Project would reduce impacts of the Rancho Los Amigos Medical Center on neighborhood recreational facilities as a result of the on-campus facilities that are now available.

The 2019 RLANC Refined Project would reduce the total number of hospital beds and the total occupiable building area as compared to the Original Project and would result in similar occupiable area (increased beds, reduced housing units); therefore, there would be no increase in the number of people, residents, or visitors who would avail themselves of existing park facilities.

The Rancho campus now includes a gymnasium and aquatic center (of inpatient and outpatient use) as part of the overall campus facilities, additional documentation of these facilities is not required. As with the Original Project, the 2019 RLANC Refined Project would not require the construction or expansion of additional recreational facilities.

Therefore, compared with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to or accelerate the physical deterioration of existing facilities, and/or the need for construction or expansion of recreation facilities.

P. TRANSPORTATION AND CIRCULATION

Transportation and traffic impacts of the project were evaluated in light of the RLAMC FEIR. The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts related to transportation and traffic was evaluated in relation to six questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		
(b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies significant impacts with respect to traffic impacts. A trip generation study was undertaken to determine the potential for changes in traffic impacts as compared to what was analyzed in the RLANC FEIR. Trip generation rates are mostly driven by beds at hospital facilities.⁵ However, trip generation rates for hospitals have changed over the years. **Table 7** shows trip generation using the old hospital trip generation rate (11.81 daily trips per bed) as well as the new trip generation rate (22.32 daily trips per bed). The trip generation for longer-term beds similar to assisted living-type beds (the veteran housing previously proposed) and nursing-home-type beds (SNF, RTP and RCC) has remained approximately constant over the years (about 2.6 trips per assisted living unit/bed and about 3.06 trips per nursing home unit/bed).

Trip generation rates are developed by the Institute of Traffic Engineers based on surveys of numerous facilities. Operation of the facilities on the RLANC has not changed, but for purposes of analysis the assumed trip generation has changed. Therefore Table 7 compares trip generation for all scenarios using old and new trip generation rates. The total number of beds and associated trip generation of the 2019 RLANC Refined Project would be lower than was existing at the time the RLANC FEIR was prepared (540 beds) as well as lower than the total project analyzed in the RLANC FEIR (600 beds) -- even assuming new rates for the RLANC Refined Project and old rates for the 540-bed (and 600-beds). In addition, trip generation would remain less than the existing trip generation for 2013 and 2014 even if new rates are assumed for the 2019 RLANC Refined Project and old rates for the hospital in 2013/2014. The 2019 RLANC Refined project would result in less trip generation than the 2013/2014 refined projects if they are compared using either the old rates for both or the new rates for both. No new significant area traffic impacts would occur.

⁵ Traffic and Parking Review of 2019 Rancho Los Amigos North Campus (RLANC) Refined Project, KOA Corporation, March 19, 2019.

**TABLE 7
TRIP GENERATION COMPARISON**

	RLAMC FEIR Existing	RLAMC FEIR Project	2013 & 2014 Existing	2013 & 2014 Addendums Project	2019 RLAMC Refined Project
Beds	540 hospital	600 hospital	396 hospital	200 hospital 200 assisted	158 hospital 280 nursing
Daily Trip generation (old rates)	6,677	7,080	4,677	3,316	3,029
Daily Trip generation (new rates)	12,053	13,392	8,839	5,406	4,805
AM peak hour tip generation old rates	577	640	448	266	235
AM peak hour trip generation new rates	994	1,100	727	423	357
PM peak hour trip generation old rates	659	730	515	329	295
PM peak hour trip generation new rates	1,02	1,130	784	475	407

CEQA was recently revised (January 1, 2019) to move away from evaluation of traffic impacts based on the Level of Service (LOS) metric. While Los Angeles County has yet to adopt guidelines implementing the new CEQA requirements, according to State guidance, traffic impacts are to be evaluated based on Vehicle Miles Travelled (VMT) and previously required mitigation measures with respect to mitigation based on the LOS metric may be reconsidered by agencies as appropriate. One of the reasons the mitigation measures based on LOS may not be required is that such measures tend to improve traffic conditions at the expense of improvements that could reduce VMT by improving bicycle, transit and pedestrian facilities.

While the RLAMC technically does not appear to be within a Transit Priority Area (TPA),⁶ it is served by two metro bus lines (Route 117 with 15-minute intervals during peak hours and Route 120 with 30-minute intervals during peak hours). In addition, as mentioned above, there is a proposed Metro transit station (Gardendale station) for the West Santa Ana Branch light rail line (proposed by Los Angeles County Metropolitan Transportation Authority as lead agency), approximately ½ mile from the RLAMC. If approved, the Gardendale station would be operational in 2028 and would improve access to the site and enhance transit ridership.

The State Office of Planning and Research has recently issued guidance with respect to how to evaluate transportation impacts.⁷ As indicated in that guidance, CEQA Guideline Section 15064.3 (b)(1), indicates that lead agencies generally should presume that residential and employment projects proposed within 1/2 mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to cause a less than significant impact on transportation. The RLAMC site internal roadways have been reconfigured (at the request of Metro) in order to improve bus transit through the site and in the area in general. It is anticipated that project employees and clients would make substantial use of transit given the close proximity to bus lines on the campus. Therefore, it is anticipated that the 2019 RLAMC Refined project would not have a significant impact on traffic and transportation under the new CEQA definition of a transportation impact. As a result of the reduction in trips, compared with

⁶ A TPA is defined as an area within 1/2 mile of a major transit stop. Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

⁷ Office of Planning and research, Technical Advisory, On Evaluating Transportation Impacts in CEQA, December 2018

the Original Project, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to transportation and traffic related to exceeding an LOS standard established by the County Congestion Management Agency for designated roads or highways.

(c) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies no impacts with respect to air traffic patterns. The RLANC is not in close proximity to any airports; it is located 5.3 miles northeast of the Compton/Woodley Airport and approximately 7.1 miles north-northeast of the Long Beach Municipal Airport. Therefore, as with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts to air traffic levels or location.

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

The RLANC FEIR identifies no impacts with mitigation with respect to hazards associated with a design feature. The 2019 RLANC Refined Project does not change external road design and has only minor modifications to the internal circulation system of the RLANC. Leeds Street is proposed to continue through the site which should improve circulation and safety on the campus. Modifications to campus circulation would improve overall traffic flow and circulation patterns in the immediate vicinity of the RLANC. Therefore, compared with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts to related to substantially increasing hazards due to a design feature.

(e) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies no impacts with mitigation with respect to inadequate emergency access. The existing emergency access system would be expected to continue to be adequate during construction and operation of the 2019 RLANC Refined Project. The 2019 RLANC Refined Project does not involve any activity that would be expected to create a deficiency in the emergency access system. All construction and demolition activity would be organized to avoid interruptions in any emergency services undertaken by Rancho Los Amigos, as well as any access/egress paths to and from its facilities. Therefore, compared with the Original Project and subsequent approved refinements project, the 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts related to inadequate emergency access.

(f) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to potential conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies no impacts with mitigation with respect to conflicts with adopted plans and policies regarding alternative transportation. The design features of the 2019 RLANC Refined Project would support rather than conflict with the use of alternative modes of transportation, including the on-site provision for transit access. Therefore, compared with the Original Project and subsequent approved refinements, the 2019 RLANC Refined Project would not be expected to result in new or substantially more adverse significant impacts related to a conflict with adopted policies, plans, or programs supporting alternative transportation.

Q. UTILITIES

Utilities and service systems impacts of the proposed RLANC Refined Project were evaluated with regard to the RLANC FEIR (including the Initial Study) and required mitigation measures. The potential for the 2019 RLANC Refined Project to result in new or substantially more adverse significant impacts to utilities and service systems was evaluated in relation to seven questions recommended for consideration by the State CEQA Guidelines.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(a) Exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board? (b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identifies less than significant impacts with respect to wastewater treatment and less than significant with mitigation with respect to water and wastewater infrastructure. Wastewater generated at the RLANC is treated at the Whittier Narrows Water Reclamation Plant (WRP). The WRP is located approximately 13 miles northeast of the RLANC, at 301 North Rosemead Boulevard in El Monte, California. The WRP has the capacity to treat up to 15 million gallons of primary, secondary, and tertiary wastewater per day.

As with the previous project refinements, the 2019 RLANC Refined Project would continue to result in substantially lower generation of wastewater than the Original Project by approximately 42.5 percent due to the reduced occupiable building area and beds. Wastewater would continue to flow into the existing system. Therefore, the 2019 Refined Project would result in reduced wastewater flows as compared to the Original Project that, similar to the Original Project and previously approved refinements, would not necessitate the expansion of existing or construction of new sewer lines. Therefore, compared with the Original Project and subsequently approved refinements, the 2019 Refined Project would not result in new or substantially more adverse significant impacts to utilities and service systems related to exceedance of wastewater treatment requirements.

The RLANC and other nearby uses are served by the Rancho Water System, which is owned and operated by the County and backup (redundancy) water is provided by the City of Downey for fire water and the Metropolitan Water District of Southern California (MWD) for domestic water. As with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would continue to require implementation of the specified mitigation measures for water and infrastructure upgrades.

Due to the reduction in overall occupiable building area and hospital as compared to the Original Project and similar occupiable area as previous project refinements, the 2019 RLANC Refined Project would generate less wastewater than the Original Project and similar to previous approved refinements to the project. Wastewater that would be generated by the 2019 RLANC Refined project would be treated at the WRP, which has the capacity to accommodate the additional wastewater generated by planned growth including the project. Therefore, compared to the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to expansion or construction of new water or wastewater treatment facilities.

(c) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to requiring or resulting in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies less than significant impacts with mitigation respect to stormwater drainage. The 2019 RLANC Refined Project would result in substantially reduced building area as compared to the Original Project and similar occupied building area as compared to previously approved project refinements. There would be less total impervious surface area. Therefore, no contribution to an exceedance in runoff would be expected to result with the overall change in building coverage and paved areas for the 2019 RLANC Refined Project. The intersection of Quill Drive and Rives Avenue (northeast of the RLANC) had historically experienced flooding even during periods of moderate rainfall. Flood improvements were made at this intersection and as a result this area is currently capable of providing a 100-year or greater level of flood protection as required by the Federal Emergency Management Agency. As with the Original Project and subsequent refinements, implementation of the specified mitigation measures requiring existing storm drain facilities to be upgraded to adequately transport storm water runoff to existing County storm drain facilities on Imperial Highway and Old River School Road would be required. Compared with the Original Project and subsequent refinements, the 2019 RLANC Refined Project would not create new or substantially more adverse significant impacts related to construction of new storm water drainage facilities or expansion of existing facilities.

(d) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLANC FEIR identifies less than significant impacts with mitigation with respect to water supply infrastructure. Rancho Los Amigos and other nearby uses are served by the Rancho Water System and the City of Downey and MWD for backup (redundant) water. Water demand is calculated based on the number of square feet of occupied building space, the 2019 RLANC Refined Project would result in less water demand than anticipated for the Original Project and similar demand as for subsequently approved refinements. The 2019 RLANC Refined Project would continue to require implementation of the specified mitigation measures for infrastructure upgrades. Therefore, compared with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more

adverse significant impacts related to having sufficient water supplies from existing entitlements and resources, or resulting in the need for new or expanded entitlements.

(e) Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to resulting in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identifies less than significant impacts with respect to wastewater treatment and less than significant with mitigation with respect to local wastewater infrastructure. As noted above, the wastewater generated at the RLANC is treated at the WRP. As with the previously approved refinements, the 2019 RLANC Refined Project would continue to result in substantially lower generation of wastewater than the Original Project by approximately 42.5% due to the reduction in occupiable building area and reduction in beds. The 2019 RLANC Refined Project would result in similar occupiable building area as compared to the previously approved project refinements. Wastewater would flow into the existing system. The 2019 RLANC Refined Project would not require construction of new or expanded sewer lines, beyond what would have occurred as a result of the Original Project and subsequently approved refinements.

Therefore, compared with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not result in new or substantially more adverse impacts related to the wastewater treatment provider's capacity to serve the 2019 RLANC Refined Project within existing committed capacities.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		
(g) Comply with federal, state, and local statutes and regulations related to solid waste?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR identifies a significant cumulatively considerable contribution with respect to solid waste. The County is required to divert at least 50 percent of the construction solid waste to ensure compliance with applicable federal, state, and local statutes (primarily related to the California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991 as amended) with respect to solid waste and reduce direct and cumulative impacts from construction to below a level of significance. The County will continue

to require that construction contractors manage the solid waste generated during construction by diverting at least 50 percent of the waste away from disposal in landfills, particularly Class III landfills, through source reduction, reuse, and recycling of construction and demolition debris. Construction contractors are required to submit a construction solid waste management plan to the County for approval prior to initiating work. Construction contractors are required to demonstrate compliance with the solid waste management plan through the submission of monthly reports during demolition activities that estimate total solid waste generated and diversion of 50 percent of solid waste. Compared with the Original Project and subsequently approved refinements, the 2019 RLANC Refined Project would not change anticipated demolition and would result in similar construction. As with the approved project, the 2019 RLANC Refined Project would be required to comply with the mitigation measure specified in the RLAMC FEIR in order to reduce potential impacts to solid waste disposal needs.

The 2019 RLANC Refined Project would not result in new or substantially more adverse significant impacts related to a landfill with sufficient space to accommodate the project's waste disposal needs and would not be expected to result in new or substantially more adverse significant impacts related to compliance with federal, state, and local statutes.

R. GROWTH INDUCING IMPACTS

The RLAMC FEIR determined that the Rancho Los Amigos Medical Center Project would not result in substantial growth inducing impacts.

Consistent with the RLAMC FEIR, the proposed 2019 RLANC Refined Project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The RLANC Refined Project would entail redevelopment of an existing medical center. The RLANC Refined Project would be located in an urban area within the City of Downey and would be consistent with permitted uses and densities called for at the site. Additionally, the project would be located in close proximity to various public transportation opportunities.

Overall, as with the RLAMC FEIR, the proposed 2019 RLANC Refined Project would not result in an increase in the population that could tax existing community service facilities or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulatively. Thus, the proposed RLANC Refined Project would not result in significant growth-inducing impacts.

The proposed 2019 RLANC Refined Project would be built in an existing urban setting and served by existing infrastructure and adjacent streets. The proposed 2019 RLANC Refined Project would not provide through access to vacant undeveloped parcels whose development potential could otherwise be enhanced, nor would it require extending or improving infrastructure in a manner that would facilitate off-site growth.

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

S. MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory Findings of Significance were evaluated with respect to the RLAMC FEIR and three questions.

Does the proposed 2019 RLAMC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
a) Potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The RLAMC FEIR concluded that the Rancho Los Amigos Medical Center Project would have significant impacts with respect to the issue areas identified below. (How the proposed RLAMC Refined Project would relate to these issues is also discussed.)

1. Aesthetics -- Shadows: Shading from a four-story structure of single-family homes to the north on Quill Drive during late winter afternoons was found significant. Shading of single-family housing to the north would not substantially change under the RLAMC Refined Project. Proposed 2019 RLAMC Refined project new buildings would generally be two stories and possibly up to three stories and would be set back from the northern property line.
2. Air Quality – Cumulative: While project emissions were identified as below SCAQMD thresholds, the RLAMC FEIR considered project emissions contribution to cumulative air quality impacts to be cumulatively considerable. The RLAMC Refined Project would result in construction of buildings less than previously contemplated and with less trip generation than would have occurred under previously contemplated development. Therefore, air quality impacts would be less than would have occurred under the previously approved project.
3. Construction Noise – Construction noise would increase noise on and adjacent to the development site during construction potentially affecting surrounding sensitive receptors including Apollo Park and residences in the project vicinity. Construction noise would continue to occur as anticipated for previously approved project. However, a block wall has been constructed along the northern property line which will reduce construction noise impacts to residential uses to the north.
4. Population/Employment/Housing – Cumulative: The project was thought to have a cumulatively considerable contribution to an adverse impact on Jobs-Housing balance by creating a demand for 19 dwelling units (as a result of creating 108 new jobs). The RLAMC Refined Project would substantially reduce in size (occupiable building area and beds) as compared to the Original Project, it represents continuation of a community-serving use, and would be consistent with Southern California Association of Governments (SCAG) growth forecasts for the region. (Sub-regional jobs-housing balance is no longer evaluated as a basis of determining impacts.)

5. Utilities – Solid Waste -- Cumulative: Project would result in 10 percent increase in waste (from 20.5 tons per week) that was considered a cumulatively considerable contribution to solid waste. Original Project would not be anticipated to result in a cumulatively considerable contribution to solid waste.

These significant impacts have the potential to degrade the quality of the environment. No additional mitigation has been identified and there would be no new or greater impacts than those identified in the certified RLAMC FEIR with respect to these issue areas as a result of the currently proposed changes.

The RLANC FEIR did not find that redevelopment of the Rancho Los Amigos Medical Center had the potential to, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California prehistory. The proposed 2019 RLANC Refined Project would not increase impacts compared to those analyzed in the RLAMC FEIR and therefore similarly would not substantially impact these issues.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following:		
(b) Impacts, which are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Other than the cumulatively considerable contribution to significant air quality, population/housing/ employment and utility (solid waste) impacts identified in response to question a) above, the RLAMC FEIR did not identify any other impacts that would be individually limited, but cumulatively considerable.

All impacts associated with the proposed 2019 RLANC Refined Project would not exceed those analyzed in the RLANC FEIR and therefore would not result in individually limited impacts that could be cumulatively considerable.

As with previously approved refinements, the 2019 RLANC Refined Project requires compliance with the mitigation measures specified in the adopted Mitigation Monitoring and Reporting Program (MMRP). As with previous project refinements, the 2019 RLANC Refined Project incorporates features in the project description to avoid impacts to environmental resources:

- Rehabilitation and adaptive reuse of the Harriman Building.
- Construction monitoring for cultural resources.
- Preparation of a Hazardous Materials Business Plan.
- Preparation of a Storm Water Pollution Prevention Plan for the Construction Phase of the Project.

- Preparation of Standard Urban Stormwater Mitigation Plan for the Operations Phase of the Project.

Does the proposed 2019 RLANC Refined Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (c) Environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The five significant impacts identified in response to question a) above that were analyzed in the RLANC FEIR would have the potential to cause substantial adverse effects on human beings, either directly or indirectly. However, the proposed RLANC Refined Project would not require additional mitigation or result in new or greater impacts than those identified in the certified RLANC FEIR with respect to these issue areas. As noted above, the project also includes additional measures that would reduce impacts as compared to the Original Project.

T. CONCLUSION

The proposed 2019 RLANC Refined Project is described in Section 2 of this Addendum and would be within the assumptions analyzed in the RLANC FEIR and subsequent approved addendums. The proposed 2019 RLANC Refined Project has been reviewed by the County of Los Angeles in light of Sections 15162 and 15163 of the Guidelines. As the CEQA Lead Agency, the County of Los Angeles has determined, based on the analysis presented herein, that none of the conditions (identified in Section 1) apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified RLANC FEIR is the appropriate environmental documentation under CEQA for the proposed 2019 RLANC Refined Project.

Section 3 discusses issue-by-issue how the impacts anticipated for the proposed 2019 RLANC Refined Project would be within those previously identified in the RLANC FEIR. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the RLANC FEIR would continue to apply to the proposed 2019 RLANC Refined Project to ensure that all impacts are reduced as necessary and feasible.

As discussed throughout this Addendum (see in particular the summary presented in **Table 6**, the proposed 2019 RLANC Refined Project would result in environmental impacts within those analyzed for every issue with implementation of applicable mitigation measures as included in the adopted MMRP for the Rancho Los Amigos Medical Center – North Campus Consolidation.

4. REFERENCES

County of Los Angeles, Rancho Los Amigos Medical Center, Final Environmental Impact Report (SCH No. 91071053), certified April 1992. Referred to herein as the RLAMC FEIR.

Addendum No 1, Rancho Los Amigos North Campus Consolidation, adopted February 26, 2013.

Addendum No. 2, North Campus Site Consolidation, adopted July 29, 2014.

5. REPORT PREPARATION

County of Los Angeles

Department of Public Works

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Yugal K. Lall, PE, Senior Capital Projects Manager

EFI Global

5261 West Imperial Highway

Los Angeles, CA 90045

Matt Rodda, SoCal/SoNevada District Manager

Wendy Lockwood, Project Manager

Wendy Lockwood

Education

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

Professional Affiliations

Association of Environmental Professionals
Los Angeles Conservancy
American Planning Association

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

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

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

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

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities.

Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).



RESUMES

BRIAN MARCHETTI, AICP

SENIOR TRANSPORTATION PLANNER

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

RELEVANT EXPERIENCE

On-Call Engineering & Planning Services, Glendale, CA

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

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

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

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



EDUCATION

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

REGISTRATIONS

American Institute of Certified Planners, #016504

PROFESSIONAL AFFILIATIONS

American Planning Association, Member

Southern California Planning Congress, Vice President of Communications

Los Angeles County Regional Planning History Association



Brian Marchetti, AICP, Page 2

West Hollywood Avenues Streetscape TIS, West Hollywood, CA

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

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

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

El Segundo Smoky Hollow Specific Plan Traffic/Parking Study

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

LA Street Civic Building EIR / Parker Center Site

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

East Los Angeles Specific Plan, Los Angeles, CA

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